



SUSTAINABILITY
REPORT



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We strive to do **better every day** on our sustainability journey.



ABOUT THE REPORT

The 2023 Sustainability Report covers the activities of Norm Holding A.Ş. (Norm Holding) and its affiliated companies between 1 January and 31 December 2023. The report presents the sustainability strategies, goals and performance of Norm Holding and its affiliated companies. However, as in previous years' reports, Vissart Europe, Sardeon as well as Norm 3D, Norm Machining and Norm Stamping which have been established in 2024, are not included in the 2023 Sustainability Report.

The 2023 Sustainability Report is the fourth sustainability report of the Holding and has been prepared in accordance with the standards of the Global Reporting Initiative (GRI). Furthermore, the report includes information within the scope of the United Nations Global Compact (UNGC) progress report, to which Norm Holding became a signatory in 2021, and the Holding's contributions to the United Nations Sustainable Development Goals.

The Norm Holding 2023 Sustainability Report, which has been prepared in both Turkish and English, has not been subject to independent audit.

Unless otherwise stated, the data presented in the Report reflects the performance of Norm Holding and its affiliated companies in 2023.

You can submit any questions and feedback regarding on the Report and sustainability efforts of the Holding through sustainability@normholding.com



Dear Stakeholders and Colleagues,

The earthquake we experienced last year brought profound sorrow to all of us. While we mourn the lives lost in this devastating disaster, we deeply felt once again the vital importance of solidarity and unity. To alleviate the impact of the destruction and contribute to the region's long-term recovery efforts, we, as Norm Holding, collaborated with AÇEV and Darüşşafaka, with contributions from all our employees. To support residents in continuing their lives, we also contributed to Ford Otosan's container housing project for the affected areas.

Türkiye is a country with unique natural beauty. However, despite this advantageous position, we must face with both unavoidable natural disasters, such as earthquake and environmental threats like climate change and biodiversity loss. Since the 2000s, increasing forest fires, floods, hailstorms, and landslides have unfortunately become part of our lives. According to the World Bank's 2022 report, Türkiye ranks among the countries most vulnerable to climate change, considering both its environmental impacts and socio-economic effects. Therefore, green transition and sustainable development model is critical for Türkiye.

Building on the experience we've gained over the years, we are committed to shaping the future and constructing a sustainable tomorrow. We carry on our work with a sense of responsibility for both the future of our company and the sustainability of our planet. Embracing a holistic perspective on sustainability, we have grounded our **Future Matters** approach in the United Nations Sustainable Development Goals (SDGs).

In each investment decision, we assess our environmental and social impact, along with our contribution to sustainable development. We aim to build a value chain that is committed to business ethics and principles of corporate governance, continually raising quality and safety standards. In this pursuit, we continue our work in close collaboration with our business partners.

In line with the goals of the Paris Agreement, we are committed to reducing our Scope 1 and Scope 2 emissions by 50% and increasing our renewable energy production by 50% until 2030 and to achieving net zero emissions by 2050. In 2023, we have continued our investments in energy efficiency and the transition to renewable energy. We are implementing a comprehensive decarbonization project. We are also working on the conservation of freshwater resources, improving resource efficiency and reducing waste.

While continuing our green transition projects, we are investing in **circular processes and product design**, and **twin transition**. Twin transition, which aligns digital and green transitions to support each other, offers opportunities for organizations and societies such as increase their competitive power, create new job opportunities, and reduce environmental impacts. Digital transition not only accelerates green transition through the efficiency and foresight it provides, but also promotes the automation of tasks, guiding the workforce toward more skilled jobs, improving employee welfare, and preparing the workforce for the future with digital competencies. In this regard, as Norm Holding, we have aligned our long-standing digital transition efforts with our green transition and social impact strategies.

We focus our R&D and innovation investments on circular product and process design. In this context, in 2023, we launched innovative products that meet the market demand for high-quality and safe solutions, reduced weight, emissions, and environmental impact. We support our R&D and innovation efforts with patents we have obtained. In line with our net-zero target, we will continue our investments in this area in the coming years.

The first step in sustainable development is the empowerment of individuals and communities. At the core of our sustainability strategy, we aim not only to reduce our environmental impact but also to enhance our social impact through human resources practices, occupational health and safety measures, and social responsibility projects. We are working to create an inclusive environment within our value chain that promotes diversity, supports gender equality, and enables everyone to utilize their skills and potential.

We are working towards a future-ready society through quality education and supporting industrial vocational training institutions with strong technological infrastructure to train a workforce with the technical skills required by the industry. Additionally, we provide tools and opportunities to both our employees and young people to develop digital competencies.

We take pride in successfully completing 2023 with the satisfying results achieved in our sustainability efforts. I would like to extend my sincere gratitude to all our stakeholders, especially my colleagues, for their contributions and support in our performance in 2023. In 2024, we will continue our sustainability journey with the same determination and strength.

Mehmet Fatih UYSAL

Chairperson



Dear Esteemed Stakeholders and Colleagues,

It was a very challenging year for Türkiye. We worked together in strong solidarity to overcome the devastating effects of the earthquake. Wars and conflicts in our neighboring regions continue to impact the area, causing social tensions. The economic conditions in the countries where we operate are more challenging than they have been in a long time.

Despite these obstacles, Norm Holding maintained its investments and sustainable growth throughout 2023. We increased our turnover to 499 million euros, expanded our workforce to 4,129 employees, and raised the number of countries to which we export to over 50. Our operations now span 24 companies and 20 production facilities across 4 continents and 9 countries, as we continue to invest in agriculture, engineering, and e-commerce.

In 2023, JCR Eurasia Rating evaluated Norm Fasteners Bolt Salihli and Norm Fasteners Nuts with a credit rating of AA- (Very High Credit Quality), while Norm Fasteners Bolts Izmir received an A+ (High Credit Quality) rating.

Behind these achievements lies our comprehensive **Future Matters** approach, which has been integrated into the core of our business strategy.

Rather than focusing solely on financial success and market share, we also assess our environmental and social impacts, recognizing their critical importance for both organizations and society in the medium term. For Norm Holding, sustainability is not only about transitioning to a low-carbon economy and minimizing environmental impact.

We believe that true sustainability must be built on a strong corporate governance structure. Accordingly, we have structured our governance mechanisms in alignment with corporate governance principles and business ethics. I am proud to announce that in 2023, Norm Holding's corporate governance score was elevated from 9.04 to 9.19.

Under our **Planet Matters** approach, we continue to advance our projects in energy and resource efficiency, waste reduction, and renewable energy investments to support the transition to a low-carbon economy. In 2023, we completed the installation of rooftop solar power plants (SPPs) across six of Norm Holding's companies. Further investments in ground-mounted and rooftop SPPs have been planned for the coming years.

As part of our decarbonization efforts, we implemented a portion of our investments in electrification. These initiatives will continue through 2024. We are also advancing our projects focused on reducing freshwater consumption, decreasing waste, and machinery investments. In 2023, we invested 4.2 million euros in green transition.

Green transition cannot be swiftly implemented without innovation and digital transformation. At Norm Holding, we believe that the intersection of **Planet Matters**, **Work Matters**, and **Technology Matters** lies in two main strategies: **twin transition** and **circular product and process design**. With this approach, we invested a total of 9 million euros in R&D and twin transition in 2023.

Our R&D efforts in **circular product and process design** have led to the launch of our innovative **EXTREMELIGHT®**, **NOW® LIVE™**, **NORMSELF®**, and **Hexlight®** product lines, which reduce weight, consume fewer resources, generate less waste, and result in lower emissions. These products not only lessen our environmental impact but also respond to the evolving needs of our customers with high quality and safety standards, creating new opportunities in the market.

Under the leadership of **Norm Digital**, we have aligned our ongoing digitalization programs with green transition and made **twin transition** one of our primary investment focuses. We raised our **digital maturity level** from 54.765 in 2022 to **55.95 in 2023**. Through our Paperless Factory and Office projects, we digitized numerous processes, significantly reducing paper use and optimizing tracking and planning, thereby improving resource efficiency. Our dynamic software robot, Normie, has enabled us to redirect our employees toward higher value-added tasks, reducing time and resources spent on routine work. Additionally, our data analytics projects are making planning processes more efficient, reducing emissions through the energy and resource efficiency we achieve.

The most crucial component of twin transition is people. An economy shaped by digitalization and green transition offers numerous opportunities for employee welfare, sustainable development, and new jobs.

However, the workforce must improve the skills to meet the demands of this new economic model. At the intersection of **Human Matters** and **Technology Matters**, enhancing the digital competencies of our employees and society is essential for building a future-ready, competitive workforce. With this purpose in mind, we continue to advance the digital competency programs we introduced for our employees in previous years. In addition to our employees, participation in

our **DigiConnect Online Development Program** for students, launched in 2020, and our **SAP Academy**, established in 2022, has been increasing each year as we work to enhance digital skills across society.

Under our **Human Matters** approach, we also support vocational education by establishing schools with strong technological infrastructure and through our internship and new graduate programs.

Equally important as quality education are diversity, equity, and inclusion. As Norm Holding, we actively support gender equality and are committed to fostering an inclusive environment that encourages diversity within our value chain.

I am proud to present the details of our Future Matters initiatives with complete transparency in our 2023 Sustainability Report for our stakeholders. To leave a livable world for future generations, we will continue working to support sustainable development. I extend my heartfelt gratitude to all our colleagues and business partners who help us progress successfully on this long and challenging journey.

Nedim UYSAL

Vice Chairperson and CEO



Dear Stakeholders,

2023 was a challenging year marked by high macroeconomic uncertainties, escalating impacts of conflicts and wars in our region, and deepening income inequality and disparities both between and within nations on a global scale. We demonstrated remarkable solidarity in the face of the devastation caused by the earthquake. However, before we could recover from the effects of the earthquake, we faced further challenges with floods and large-scale forest fires.

To be prepared for the impacts of natural disasters, climate change, and biodiversity loss, and to address chronic social issues, we must act now for sustainable development. We need companies that align their actions with the **United Nations Sustainable Development Goals (SDGs)** and the principles of corporate governance to leave a better world for future generations.

At Norm Holding, with our **Future Matters** approach grounded in the SDGs, we work to establish a sustainable business model focused on **Human Matters, Planet Matters, Technology Matters, and Work Matters.**

In alignment with the **Paris Agreement** goals, we are committed to reducing our scope 1 and 2 emissions by 50% by 2030 and achieving net zero by 2050. To this end, we are working to minimize the environmental impact of our production processes and value chain in line with **SDG 12: Responsible Consumption and Production**, and **SDG 13: Climate Action**. We allocated €4.17 million in 2022 and €4.2 million in 2023 for environmental investments.

To accelerate the transition to a low-carbon economy, we have intensified our decarbonization projects. While continuing our SPP investments within the scope of **SDG 7: Affordable and Clean Energy**, we have reduced natural gas consumption through electrification at our production facilities. We aim to source 40% of our electricity from solar energy by 2026.

Our greatest competitive advantage has always been our R&D and innovation efforts. Our **Circular Product and Process Design** and **Twin Transition** initiatives not only accelerate our green transition but also enhance our competitiveness. In 2022 and 2023, we developed high-quality, safe, lightweight, and low-emission products that meet market demands. In 2023, we filed nine patent applications, raising our total number of patents to 40.

We view Twin Transition as one of the core strategies that will accelerate our progress toward our **Future Matters** goals. In 2023, we increased the number of projects within the scope of Paperless Factory and Office. By transferring 135 processes to Normie, our digital assistant, in addition to 73 processes in 2022, we automated a total of 208 processes, saving 12,600 hours of labor monthly. We also digitized our planning, sales, and inventory management processes with Normie.

For us, sustainability means, above all, **Human Matters**. Within the framework of **SDG 8: Decent Work and Economic Growth** and **SDG 10: Reduced Inequality**, we focus on improving occupational health and safety, human resources practices, and employee well-being.

We are committed to promoting **SDG 5: Gender Equality**, diversity, equity, and inclusion, not just within the Holding, but across our entire value chain. By 2030, we aim to increase the proportion of women in STEM positions to 50%, senior management to 30%, middle management to 35%, and all management positions to 33%. To support this, we offer mentorship programs, leadership training, and opportunities for women to take on project responsibilities. In 2023, women in STEM positions reached 34%, women in senior management 25%, and women in management roles 23.8%. To increase women's employment in the sector, we provided internships to 50 young female students by including them in our Young Talent Programs in 2023.

Our sustainability journey cannot succeed without **SDG 17: Partnerships for the Goals**. Thus, we prioritize partnerships with business partners and international organizations. We aim to create a fair, safe, and dignified work environment across our entire value chain while reducing our environmental impact. In line with this, we launched **the Supplier Sustainability Program** in 2023 and initiated ESG audits in our supply chain. We support our suppliers in improving their sustainability performance based on the audit results.

In 2022, we joined the United Nations Global Compact's (UNGC) **Climate Ambition Accelerator Program**. Under the **UNGC Young Professionals for SDG Innovation Program**, our teams will represent Türkiye at the **2024 UNGC Leaders Summit** with their project proposals. In 2024, we joined the UNGC **Target Gender Equality program**, which will support us in becoming a signatory of the **Women's Empowerment Principles (WEPs)** by 2025.

We work every day to achieve even better results on our sustainability journey. The successes and recognition we have received along this long journey motivate us further. I am proud to announce that Norm Fasteners has been awarded a **Silver Medal** by EcoVadis for ranking in the top 25% in sustainability performance among over 50,000 companies assessed in 2023.

As Norm Holding, we are pleased to share our fourth sustainability report with our valued stakeholders and the public. We extend our gratitude to our esteemed colleagues, customers, suppliers, business partners, and all stakeholders for their valuable contributions and support.

Duygu UYSAL SİMROOĞLU

Member of Board of Directors



With our 50 years of experience and a total of 24 companies, **we export to over 50 countries.**



**ABOUT
NORM HOLDING**

ABOUT NORM HOLDING

Since its journey began in 1973, Norm Holding has grown into a stronger position in the global market, competing with a commitment to quality and a vision rooted in innovation and technology.

forging, agriculture and food in national and global markets with over 4,000 employees, 24 companies and 20 production centers, 8 of which are abroad. It exports to over 50 countries.

Norm Holding operates in diverse range of sectors, including fasteners, information technologies, commerce, technology, additive manufacturing, mold sheet shaping, machining, chemistry, machinery and automation, hot

Holding is among the leading institutions of Türkiye with its production capacity, focus on quality and safety, technology investments, sustainability approach and innovative human resources perspective.

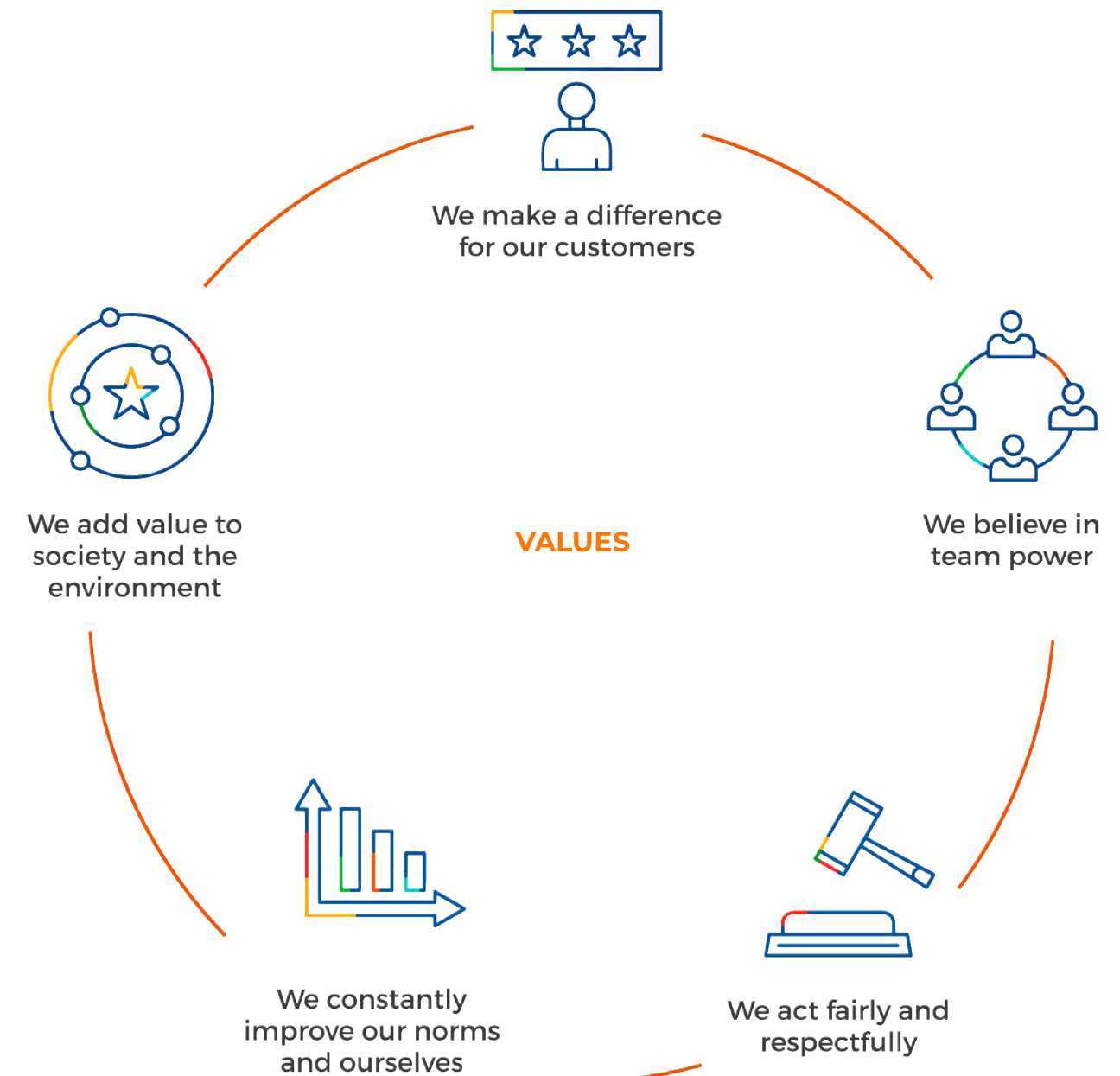


VISION

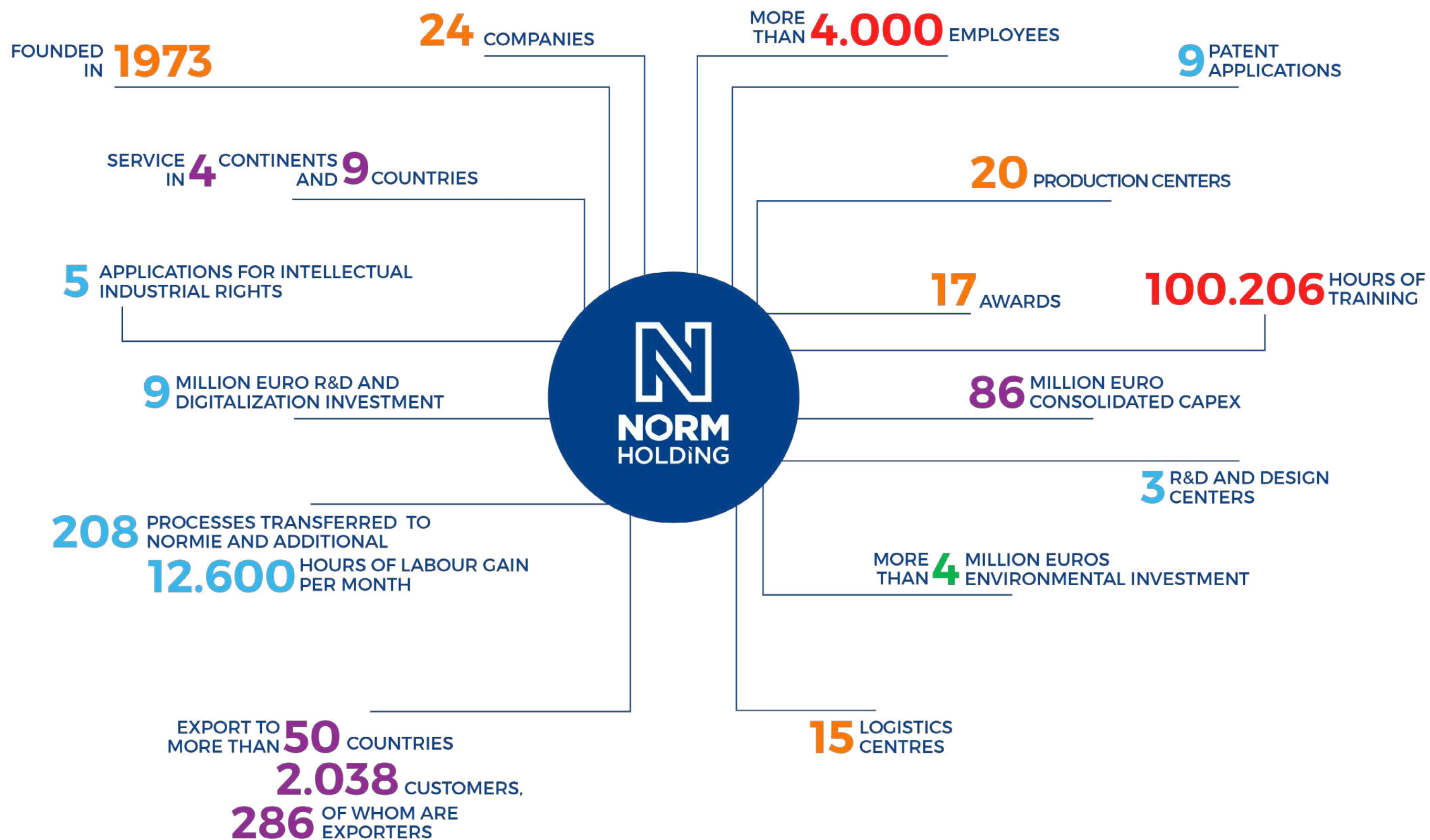
To be a global company that pursues excellence together with its employees.

MISSION

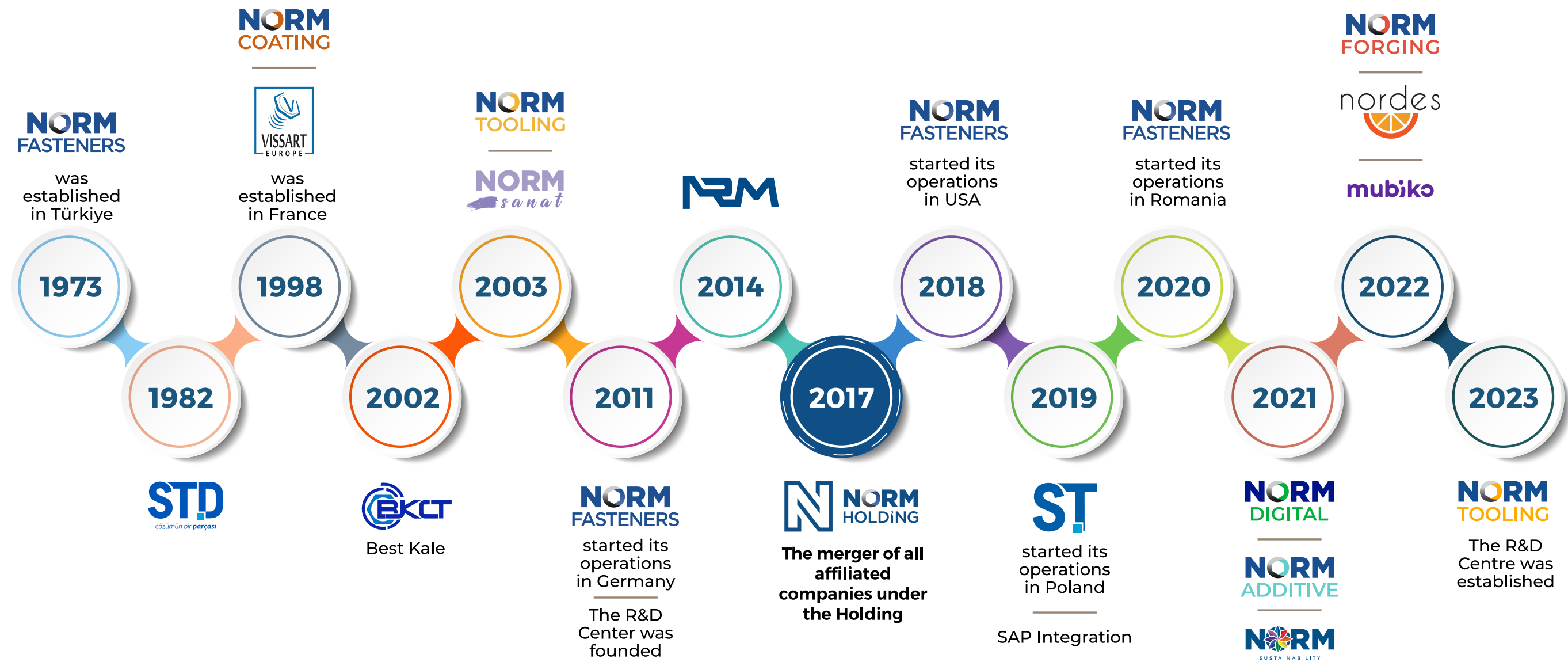
To be a global solution partner that creates value for its stakeholders, is always trusted and preferred.



2023 IN FIGURES



MILESTONES



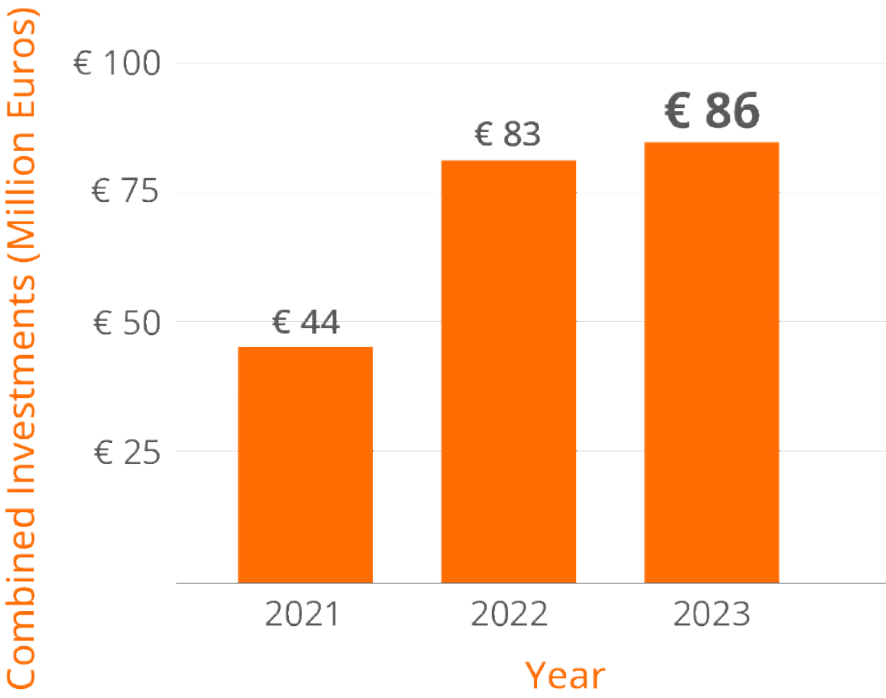
2014	İzmir Atatürk Organized Industrial Zone Nedim Uysal Anatolian Technical High School was opened.
2017	Norm Fasteners Nut Design Centre was established.
2018	Norm Academy was established.
2021	The Norm Sustainability Committee was established, and the first sustainability report was published.
	Norm Holding became a signatory to United Nations Global Compact (UNGC).
	The first corporate carbon footprint calculation was carried out in accordance with ISO 14064.

2022	Norm Holding won the North Star Sustainability Award in the 5th the North Star Sustainability Program Award Ceremony organized by the Turkish Family Business Association (TAİDER).
2023	Norm Holding Corporate Governance Rating was raised to 9.19
	Norm Fasteners was awarded a Silver Medal by ranking in the top 25% of companies on the Ecovadis platform.
	Deloitte awarded Norm Holding the Best Managed Companies Award.

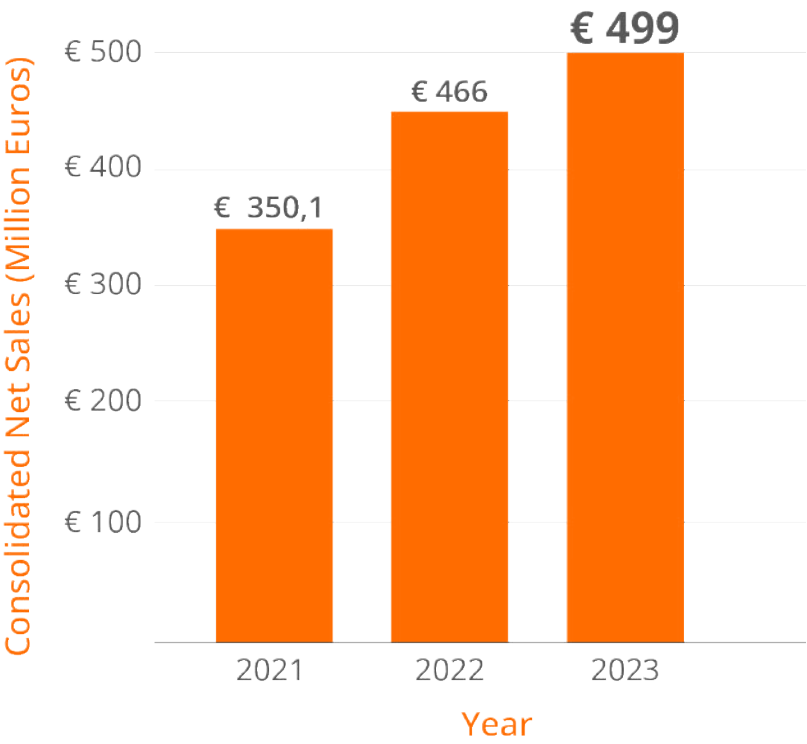
* Vissart Europe, Sardeon as well as Norm 3D, Norm Machining and Norm Stamping which have been founded in 2024, are not included in the 2023 Sustainability Report.

2023 ECONOMIC PERFORMANCE AT A GLANCE

Combined Investments



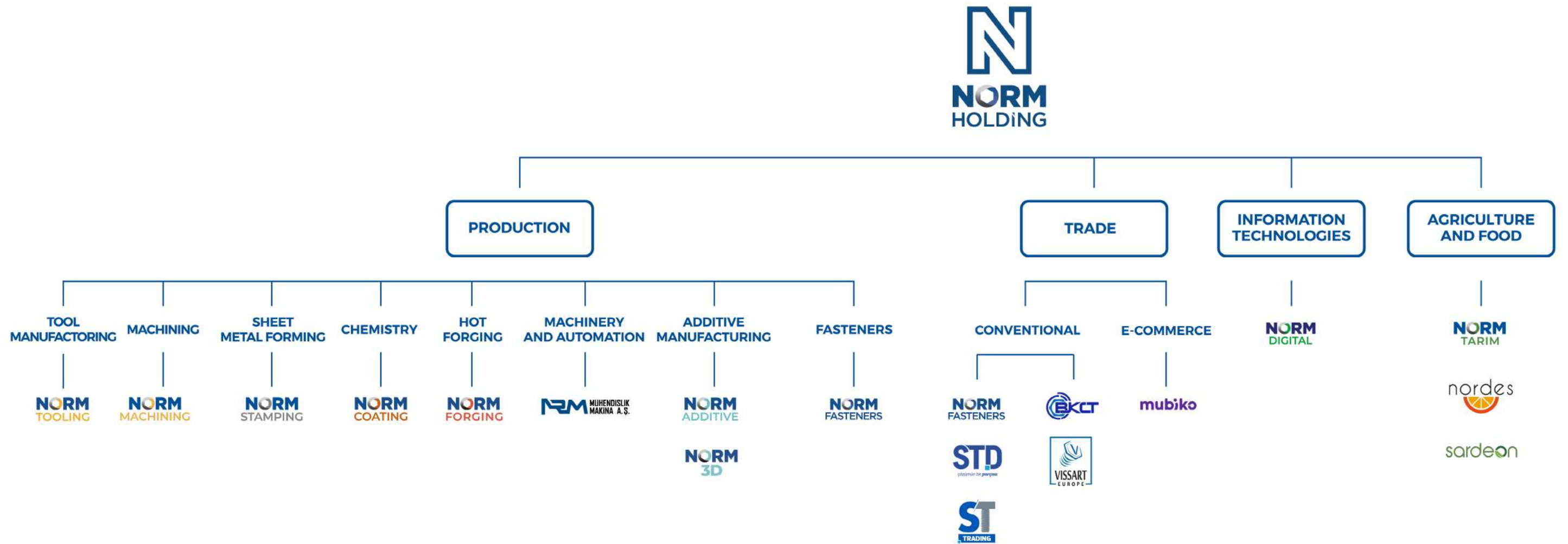
Consolidated Net Sales



**Norm Holding net sales excluding its oversea subsidiaries.*



NORM HOLDING AND AFFILIATED COMPANIES



* Vissart Europe, Sardeon as well as Norm 3D, Norm Machining and Norm Stamping which have been founded in 2024, are not included in the 2023 Sustainability Report.

PRODUCTION

Norm Fasteners Bolts and Screws

Norm Fasteners Bolts and Screws began production in Izmir Bornova in 1973. In 1994, it relocated to a modern facility in Izmir Atatürk Organized Industrial Zone.

There are three different production facilities in Izmir and Salihli, including two bolt plants and one screw plant. Norm Fasteners holds the highest production capacity within Norm Holding and primarily supplies standard and special fasteners to the main and sub-sectors of the automotive industry.

With investments made in 2023, Norm Fasteners increased its bolt and screw production to 106,002 tons, achieving 95% of its production target.

Norm Fasteners Nuts

Norm Fasteners Nuts operates two production facilities in Izmir and Salihli. The company supplies standard and special fasteners to the main and sub-sectors of the automotive industry. It is the leading manufacturer in Türkiye for automotive-specific products such as special welding nuts and bushings.

With investments made in 2023, its total production capacity has exceeded 50,000 tons. Additionally, a three-basin annealing facility has been established at the Salihli plant.

The total production volume for 2023 reached 41,652 tons, and the production target was achieved 100%.

Norm Fasteners America

Established in 2018 in Lansing, the capital of Michigan, Norm Fasteners America relocated to Dimondale in 2019. The company operates within a 2,500 m² enclosed area and houses a logistics center with a capacity of 2,448 pallets, supplying fasteners to the main and sub-sectors of the automotive and agricultural equipment industries. In addition to warehousing, it offers engineering and after-sales support services. Focused on serving customers across North America, the company aims to strengthen relationships and build new connections, particularly with electric vehicle manufacturers and international automotive OEMs.

To provide faster service, mitigate supply chain risks, and expand its market share, the company plans to establish Norm Holding's first overseas production facility with an investment of 50 million USD. Production is set to begin by the end of 2025, with an initial capacity of 7,500 tons, eventually scaling up to 20,000 tons. Additionally, to meet growing demand with quality and timely deliveries, the company has initiated the construction of a new 6,000 m² warehouse.

The Company has successfully achieved its targets with 100% growth in 2023. Moreover, it has completed the IATF 16949 on-site audit.

Norm Fasteners Germany

Norm Fasteners Germany was established in 2012 in Spaichingen and relocated to Krefeld in 2016. Serving the automotive industry, the company provides fastener supply and warehousing services within a 3,910 m² facility, featuring a logistics center with a 5,424-pallet capacity.

In 2023, Norm Fasteners Germany increased its revenue by 32% and achieved a 20% rise in its customer base. Additionally, the company earned an "A Performance Rating" from its clients in both 2022 and 2023. While the majority of its customers are based in the European Union (EU), the company has also expanded its sales to other markets.



NORM
FASTENERS

Norm Tooling

Norm Tooling was established in 2003 and began producing mold for fasteners and custom machining parts in 2006. Operating within a 10,000 m² area, including 5,000 m² of indoor space, the company provides cold forming mold production, machining, and sheet metal forming services, catering to the automotive, home appliance, aerospace, and machinery manufacturing industries.

In addition to its TS Quality Management System certification, Norm Tooling achieved IATF16949 certification in 2023 and has initiated planning for AS9100 certification. The company was also designated as an “R&D Center” by the Ministry of Industry and Technology in 2023.

Norm Tooling renewed its production line in 2023, increasing production capacity by 25%. Investments in CNC lathe machinery expanded machining capacity by an additional 25%.

With an expanded customer portfolio and new product lines, the company's sales revenue grew by 50% in 2023.



Norm Coating

Norm Coating

Established in 1998, Norm Coating operates six production facilities across Izmir, Salihli, and Sakarya, providing coating services for the fastener industry. Serving mainly the automotive sector, along with spare parts, home appliances, electronics, furniture, construction, and machinery industries, Norm Coating operates licensed zinc, zinc-nickel, phosphate, and lamellar coating lines in partnership with MacDermid, Dörken MKS, Magni, and NOF (Geomet).

The Izmir facility specializes in spray and wet painting services, while the Sakarya facility works exclusively on OEM TR1-TR2 specifications and, together with the Salihli Rack facility, offers services beyond the group.



In 2020, Norm Coating integrated sorting and packaging facilities into its operations. The fully automated zinc and zinc-nickel hanging lines at the Sakarya facility, initiated in 2022, were completed and launched in 2023. Installation of a brake disc painting line, started the same year, is ongoing. Additional sorting and packaging units and zinc-nickel lines at the Salihli facility are also under development, with the Pultz zinc lamellar coating line expected to start operations in 2024. This investment will make Salihli the second facility worldwide in this field and increase monthly production capacity from 1,400 tons to 2,000 tons, representing a 43% rise in overall production capacity.

OHSAS audits across Norm Coating plants were completed in 2023. The Izmir plant has acquired ISO14001, ISO45001, and ISO50001 certifications for integrated management systems, with certifications for other facilities planned for 2024.

Norm Forging

Norm Forging is established in 2021 in Manisa/Salihli Organized Industrial Zone. The company designs and produces hot forging dies, performs die simulation studies, and manufactures parts for various industries, including automotive, mining, machinery, defense, energy, agricultural machinery, trucks, and heavy machinery. It has invested in hot forging press lines with 800, 1,000, 1,600, and 2,500-ton capacities, as well as 200 and 500-ton press lines and a 1,500 kg capacity heat treatment facility. In 2023, Norm Forging completed its strategic planning with the vision of becoming a technology-focused leader in the hot forging industry.



NRM Engineering

Established in 2014, NRM Engineering develops quality control machines that ensure 100% product inspection in the fastener industry and specializes in custom machinery design. The company produces robotic automation systems tailored to the fastener sector, offering solutions in robotic applications, machine vision test and measurement equipment, product inspection systems, lubrication robots, delta robots, robotic welding systems, assembly fixtures, and machine applications. Additionally, NRM Engineering has a dedicated section for sheet metal die production, where it designs and manufactures progressive dies and various cutting, bending, and forming dies.

NRM Engineering has sustained steady growth over the past six years, with international sales reaching 8% of total revenue by 2023. To enhance market presence, strengthen teams, and intensify R&D efforts, strategic steps are being planned for the coming years.



In 2024, the company aims to design products tailored to European customer needs, test market compatibility, and reinforce sales and support teams.

Norm Additive

Established in 2021, Norm Additive provides advanced additive manufacturing and engineering services for metal and plastic parts across industries including automotive, household appliances, aerospace, machinery manufacturing, general manufacturing, and medical sectors.

A significant advantage of additive manufacturing is minimal waste; 90% of polymer raw materials are recycled within production processes, nearly eliminating waste.

Specialized extraction and collection systems have been implemented to eliminate dust emissions.

Through awareness projects on workplace safety, Norm Additive has completed its third year of operation with zero workplace accidents.

In 2023, Norm Additive signed a partnership agreement with GE Additive and achieved Türkiye's largest metal printer sale, offering maintenance and service for metal printers to multiple companies.

To support clients looking to invest in additive manufacturing, Norm Additive established Norm 3D to provide machinery, spare parts, services, and raw materials. As part of this effort, Norm 3D partnered with Germany-based EOS GmbH for sales and service of metal SLM and polymer SLS technologies and invested in 3D scanning systems.

In 2023, Norm Additive produced approximately 40,000 parts and obtained a Turkish patent for its “Additive Manufacturing Technologies Cost Calculation System,” with an international patent application filed under the Patent Cooperation Treaty (PCT).



TRADE

Standart Civata (STD)

Established in 1982, STD provides high quality products and services to industries such as energy, construction, agriculture, furniture, electrical, workplace safety, defense, transportation, automotive, household appliances, machinery, and mining. STD's extensive product range includes bolts, nuts, screws, washers, anchors, stainless steel products, rivets, gas pistons, hinges, chemical products, workplace safety equipment, and hand tools.

With warehouses located in Izmir, Kocaeli, and Ankara, totaling a capacity of 40,000 pallets, STD maintains approximately 15,000 tons of ready stock, delivering to 67 cities and over 50 countries.



Supporting its strategic goals with its digital infrastructure, STD extended its B2B portal to Global B2B portal for its international customers in 2023. The platform allows customers to effectively manage their inventory, view past orders, payment statuses, invoices, and track shipments conveniently through a single platform. This development has enhanced operational efficiency and strengthened customer satisfaction.

The company has increased its turnover by 10% in 2023. Additionally, STD expanded its market presence by adding new products, such as work shoes, to its portfolio.

In 2024, STD plans to increase pallet capacity by 20% with a new warehouse investment in Salihli and aims to boost operational efficiency and contribute to its sustainability goals through an Automated Guided Vehicles (AGV) project.

ST Trading

ST Trading, operating in sales and marketing under the umbrella of Norm Holding, was founded in 2019 in Poznan, Poland. The company operates with a closed warehouse area of 2,500 m² and a pallet capacity of 4,250. In addition to the products manufactured under Norm Holding, it offers a wide range of products sourced from various regions around the world. To respond more quickly to customer demands, the company added 200 new products to its portfolio, increasing the total number of products to 4,500.



ST Trading, with its marketing team in Poland and office staff at the head office, provides services to 21 different countries in the agricultural, automotive, construction, furniture and PVC industries. ST Trading's strategic location enables it to offer logistical support to industrial zones in Eastern Europe and to be an efficient solution partner for its business partners.

By utilizing the Global B2B platform, ST Trading aims to provide more efficient services to its customers. In 2024, the company plans to increase its competitiveness by improving business processes through digital transformation projects with Norm Digital.



Norm Fasteners Romania



Norm Fasteners Romania, operating in sales and marketing, was founded in 2019 in Ilfov, Romania. The company operates in a 2,450 m² closed area with a pallet capacity of 3,500. In addition to the products manufactured by Norm Holding companies, Norm Fasteners Romania offers products from highly competitive suppliers with a focus on quality.

With its strategy to diversify the sectors it serves, the company also supplies fastening products to customers in agriculture, construction, furniture, and PVC sectors, in addition to the automotive industry.

Best Kale

Established in 2002 in İstanbul, Best Kale offers sales and logistics services with its 8,250-pallet capacity in 4,500 m² indoor area. With over 70 employees, it operates with 100% customer satisfaction in domestic and global markets.



A cold wire extrusion facility has been launched under the company in 2022 in Kırklareli. The company has achieved a milestone in thin diameter segment products in Türkiye with its polymer-based production without environmental waste.

The company has expanded its product range to include anchors, gloves, shoes, pallet-jacks, locks, eyebolts and tapes.

BILGI TEKNOLOJILERI

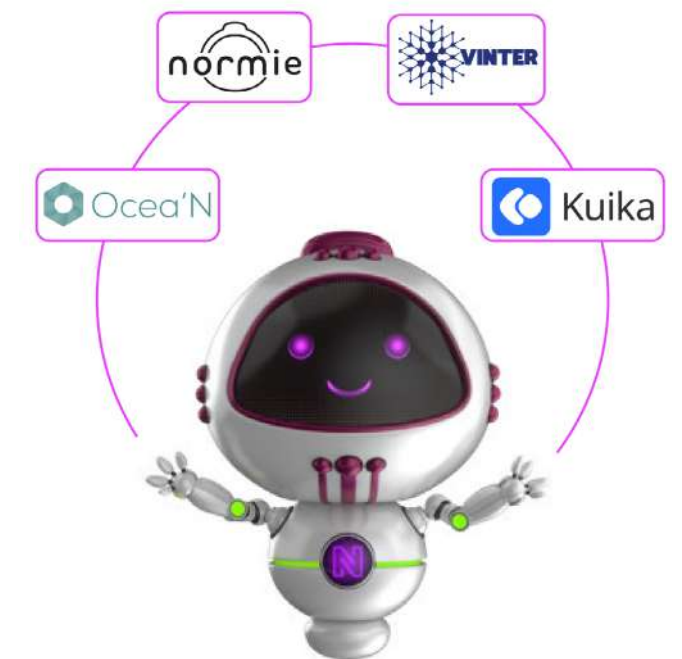
Norm Digital



Norm Digital was established in 2021 at Izmir Dokuz Eylül Technology Development Zone (DEPARK). It provides digital transformation consulting services to enterprises and offers robotic process automation (RPA), SAP implementation consulting, system and network consulting, cloud services, security services, Internet of Things (IoT), management consulting, project management and data management. It became an SAP Silver Partner in 2022.

In 2023, the Company increased the number of non-Group customers to 60 and operates in over 20 industries.

The Company's main products include dynamic software robot Normie, production management system Ocea'N, artificial intelligence supported recruitment platform Vinter and low code platform Kuika.

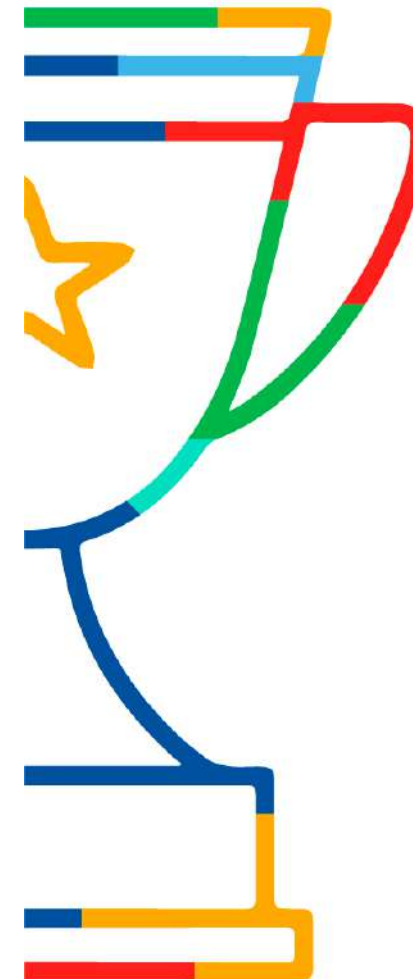


COLLABORATIONS AND INITIATIVES

MEMBER ORGANIZATIONS

Association of Fasteners Industrialists and Businesspeople (BESIAD)
White Goods Suppliers Association (BEYSAD)
United Nations Global Compact (UNGC)
Roof Industrialists and Businessmen Association (CATIDER)
Environmental Research and Application Center (CEVMER)
EBSO – 44th Group Other Metal Product Industry Professional Committee
EcoVadis
Aegean Region Chamber of Industry (EBSO)
Aegean Ferrous and Non-Ferrous Metals Exporters' Association
Aegean Young Business Association (EGIAD)
Aegean Exporters Associations (EIB)
Aegean Industrialists' and Business People's Association (ESIAD)
Association of Turkish Construction Material Producers (IMSAD)
Izmir Atatürk Organized Industrial Zone (IAOSB)
Izmir Atatürk Organized Industrial Zone Education and Health Foundation (IAOSB)
Izmir Metropolitan Municipality / Izmir Economic Development Board
Izmir Çigli Rotary Club
Izmir Chamber of Commerce (IZTO)
IZTO Education and Health Foundation
Window Manufacturers Quality Association (PUKAP)
Salihli Residents Cultura and Solidarity Association
Automotive Supplier Association of Türkiye (TAYSAD)
TOBB Turkish Automotive Supplies Industry Assembly
All Elevator Industrialists and Businessmen Association (TASIAD)
Turkish Education Foundation (TEV)
Turkish Industrialists and Businesspersons Association (TUSIAD)
Türkiye Family Businesses Association (TAIDER)
Turkish Public Relations Association (TUHID)
Türkiye Exporters Assembly (TIM)
Corporate Social Responsibility Association of Türkiye (TKSD)
Corporate Governance Association of Türkiye (TKYD)
Union of Chambers and Commodity Exchanges of Türkiye (TOBB)

AWARDS AND SUCCESSES



EcoVadis Silver Medal Award

Norm Fasteners was awarded a Silver Medal for ranking in the top of 25% in the EcoVadis 2023, which analyses the sustainability performance of over 50,000 companies.

Increase in Corporate Governance Rating

In the rating carried out by Saha Kurumsal Yönetim ve Kredi Derecelendirme Hizmetleri A.Ş. in 2023, the corporate governance rating of Norm Holding was raised from 9.04 to 9.19.

Respect for Humans Awards

Norm Holding received awards in the categories of 100% response, providing the most jobs and receiving the most applications at the 2022-2023 Respect for Humans Awards organized by Kariyer.net.

R&D 250, The List of Companies with the Highest R&D Expenses in Türkiye

In the R&D 250 held by Türkishtime in 2023, Norm Fasteners Bolts ranked 201 st in the Top 250 Companies with The Highest R&D Expenses in Turkey; 43 rd in the Top 50 Companies By Number Of National Patents Obtained In The R&D Center and 77 th in the Top 100 By Number Of Projects Conducted In The R&D Center.

AWARDS AND SUCCESSES

SaaS Project of the Year Award

Norm Holding won the **SaaS Project of the Year in Türkiye Award** with its Artificial Intelligence Based Recruitment Platform VINTER, in the Future of Clouds & AI Awards organized by Future of Consultancy and CXO Media.



Digital Transformation Award of the Year in Automotive Industry

Norm Holding won the **SAP Digital Transformation Award of the Year in Automotive Industry** in the **SAP Digital Transformation Awards 2023** organized by SAP Türkiye.

Deloitte Best Managed Companies Award

Norm Holding and its affiliated companies were awarded the Best Managed Companies Award by Deloitte Private, following evaluations conducted by an independent jury across four main areas: strategy, capability and innovation, culture and dedication, and management and finances, in 45 countries.

TIM Top 1000 Exporters List

Norm Fasteners placed 25th in the in steel industry of the Türkiye Exporters Assembly (TIM) Top 1000 Exporters list announced in 2023. Overall, the company improved its position by 48 spots, ranking 254th.

ISO Top 500 Industrial Enterprises

Norm Fasteners placed 421st in 2023 list of **ISO (Istanbul Chamber of Industry) Türkiye's Top 500 Industrial Enterprises**.

ISO Second Top 500 Industrial Enterprises

Norm Fasteners Bolts placed 390th and Norm Fasteners Nuts placed 64th in **Türkiye's Second Top 500 Industrial Enterprises** list of ISO in 2023.

Stars of Export Award

At the **2023 Export Stars Awards Ceremony**, organized by the Aegean Iron and Steel Exporters' Association, Norm Fasteners Bolts was awarded the Gold Category Award as the **Champion of Other Iron and Steel Products Exports**, based on the 2022 export performance. STD, on the other hand, received the **Bronze Category Award**.



EBSO Top 100 Large Industrial Enterprises

Norm Fasteners Nuts placed 45th, Norm Coating 59th and Norm Fasteners Bolts placed 71st in the 2022 **Izmir's Top 100 Large Industrial Enterprises** list by Aegean Region Chamber of Industry (EBSO).

Future of CIO Summit & Awards

Norm Digital was awarded Cost Savings Project of the Year in the Future of CIO Summit & Awards held by CXO Media and Future of Consultancy in 2023.

Salihli Economy Awards

In **Salihli Economy Awards** held in 2023 by **Salihli Chamber of Commerce and Industry**, members that pay the highest corporate tax and income tax, make the highest exports and provide the most employment were awarded. Norm Holding and Norm Fasteners received eight awards in export and employment areas.



Ford Otosan Supplier Awards

Norm Fasteners was awarded **Bronze Star** award in 2023 **Ford Otosan Supplier Awards** determined by the employee votes organized by Ford Otosan. It was also awarded with a plaque of appreciation by Ford Otosan for the support it has provided in the project for completing and delivering container houses to Red Crescent completed under the leadership of Ford Otosan after the earthquake disaster that affected Türkiye.



Suppliers Summit – Quality Award

Norm Fasteners was awarded **Quality Award** at the **2023 Suppliers Summit** organized by **Ditaş Group**, recognizing its outstanding performance among all business partners.

Bizimizmir Homeros Awards – Honorary Award

In the **Homeros Awards** organized second time in 2023 by **Bizimizmir Medya**, Norm Holding president Nedim Uysal was awarded with **Honorary Award** for his contribution to economy, education and arts.

TEGEP Learning and Development Awards

Norm Holding has won a **Silver Award** in the **Onboarding/Orientation Program** category at the **TEGEP Learning and Development Awards**, held annually since 2015, for its SAP Academy development programs.



We base our corporate governance approach on **ethics, fairness, transparency, traceability**, and **accountability** in order to leave a better world for future generations.



**CORPORATE
MANAGEMENT**

NORM HOLDING
CORPORATE MANAGEMENT

Norm Holding follows the best global practices in terms of transparency, accountability, traceability, ethical and fair corporate governance.

The highest governing body of Norm Holding is the Board of Directors. Regulations regarding the Board of Directors are specified in the Articles of Association of the Holding. The Board of Directors is responsible for setting strategic goals that will support the sustainable growth of the Holding and its affiliated companies, as well as for establishing corporate governance. The Board is also responsible for overseeing the transparency, traceability, and accountability of sustainability, risk management, and compliance performance, ensuring their disclosure in accordance with these principles.

The Board of Directors consists of seven members, including the Chairperson, the CEO and the Advisor. As of 2023, three members of the Board of Directors are independent and not affiliated with Norm Holding or its affiliated companies. In addition, the positions of Chairperson and CEO are held by different Board members. Norm Holding is committed to promoting gender equality and diversity, equity and inclusion, starting at Board level. Currently, 14.3% of the members of the Board of Directors and 33.3% of the members of the Executive Committee are women. The Board of Directors convenes at least once a month, with additional meetings held as required. These meetings are conducted in an extended format, with the participation of several senior managers. The Board of Directors' Secretary Office is responsible for preparing the meeting agenda, distributing it to the participants, and forwarding the meeting minutes to all relevant stakeholders.

In 2023, eleven meetings were held with 100% attendance from members.

Norm Holding Board of Directors sets strategic goals at the beginning of each year and presents performance reports to the shareholders at the end of the year. The Board evaluates the performance of the Executive Board on a quarterly basis, in line with the criteria set at the beginning of the year. Following this evaluation, the results are compared with the set goals and submitted to the shareholders.

The Board of Directors Performance Assessment is conducted annually. Additionally, the Board of Directors' capability matrix is issued annually, and the development of the scores is monitored on an ongoing basis.

Norm Holding strives to create a sustainable and transparent management structure by continuously improving its corporate governance approach. The Board's effective supervision and commitment to the principles of corporate governance ensure the long-term success of the Holding and its affiliated companies and create value for all stakeholders. In 2023, on behalf of the Holding, there were no lawsuits filed against the Board of Directors due to violations of regulations, nor were there any final administrative or judicial sanctions, as monitored and reported by our Legal Advisory Department.

Norm Holding's corporate governance structure, duties, and meeting contents can be accessed through the **Board of Directors Operating Principles** and the **Corporate Governance Principles Compliance Report**, which are published as part of the annual activity report.



BOARD OF DIRECTORS AND OUR
ORGANIZATIONAL STRUCTURE

Board of Directors Structure

Name Surname, Duty	Term, Responsibility	Committees Participated	Other Duties
Mehmet Fatih UYSAL Chairperson	April 22, 2021 – April 15, 2024* Non-Executive, Shareholder	-	Board of Directors Chair and Member in companies inside & outside the Holding
Nedim UYSAL Vice-Chairperson and CEO	April 22, 2021 – April 15, 2024* Executive, Shareholder	Investment Committee	Board of Directors Chair and Member in companies inside & outside the Holding
Duygu UYSAL ŞİMROOĞLU Board of Directors Member	April 22, 2021 – April 15, 2024* Non-Executive, Shareholder	Sustainability Committee	-
Muhittin BİLGET Board of Directors Member	April 22, 2021 – April 15, 2024* Non-Executive, Shareholder	Audit Committee Corporate Governance Committee Early Detection of Risk Committee Investment Committee	Board of Directors Member in companies inside & outside the Holding
Ceyhun ARAZ Board of Directors Member	April 22, 2021 – April 15, 2024* Non-Executive, Non-Shareholder	Corporate Governance Committee Audit Committee, Sustainability Committee	Board of Directors Member in companies inside & outside the Holding
Mustafa Sabri DOĞRUSOY Board of Directors Member	February 27, 2023 – April 15, 2024* Non-Executive, Non-Shareholder	Corporate Governance Committee Audit Committee, Early Detection of Risk Committee, Sustainability Committee	Board of Directors Member in companies inside & outside the Holding
Erkut ULUDAĞ Advisor to Board of Directors	Advisor	Early Detection of Risk Committee, Investment Committee	-

* The terms of the Board Members will continue from 15.04.2024 to 15.04.2027.

BOARD COMMITTEES



Mehmet Fatih UYSAL

Chairperson

Fatih Uysal graduated from Dokuz Eylül University, Faculty of Economics and Administrative Sciences, Department of Business Administration in 1983 and started his professional career in 1982 as General Director in STD, one of Norm Holding's affiliated companies. Fatih Uysal, who became the Deputy Chairperson of the Board of Directors of Norm Fasteners Bolts in 1995, has continued his career as the Chairperson of the Board of Directors of Norm Holding since 2013. Uysal, who was appointed Deputy Chairman of the Board of Directors of Norm Fasteners Bolts in 1995, has continued his career as Chairman of the Board of Directors of Norm Holding since 2013.

Uysal serves as a Board Member in TAYSAD, BESİAD and Aegean Exporters' Associations, as a Coordination Board Member in IBB Izmir Economic Development Board, as an Executive Board Member in Turkish Education Foundation, as a Member of the Board of Trustees in Izmir Chamber of Commerce Education and Health Foundation, as a Council Member in the Union of Chambers and Commodity Exchanges of Türkiye, and as a member of TÜSİAD, TİM, TAİDER, KALDER, ESIAD, EGİAD, Salihliler Culture and Solidarity Association.

 Mehmet Fatih UYSAL

Nedim UYSAL

Vice Chairperson and CEO

Nedim Uysal, a graduate of Izmir American College, completed his university studies in the Department of Economics at Michigan State University. Starting from his middle school years, Uysal interned in various departments of Norm Fasteners Bolts. Immediately after graduating from university, he began his professional career within Norm Holding. He currently serves as the Vice Chairperson of the Board of Directors and CEO of Norm Holding.

 Nedim UYSAL

Duygu UYSAL SİMROOĞLU

Member of Board of Directors

Duygu Uysal Simrooğlu, who graduated from Izmir American College in 2010, completed her undergraduate education in the Department of Theatre Literature and Arts at New York University. Since 2018, Simrooğlu has continued her education in contemporary dance and has been working professionally in dance and visual arts. Simrooğlu was the producer and artistic director of the Feminen dance project stage in the 2023 IKSEV Izmir European Jazz Festival with choreographer Cansu Ergin.

In addition to being a member of the Board of Directors of Norm Holding, Simrooğlu led the group's sustainability activities as the Chair of the Sustainability Committee in 2023.

 Duygu UYSAL SİMROOĞLU

Muhittin BİLGET

Member of Board of Directors

Graduating from the Faculty of Political Sciences at Ankara University, Muhittin Bilget completed his master's degree at Vanderbilt University in the United States in the Department of Economics. Between 1979 and 1993, Bilget served as the Prime Ministry of the Republic of Türkiye Sworn Bank Auditor and as the Vice Chair of the Board of Sworn Bank Auditors. From 1993 to 1995, he worked as the Economic and Commercial Counsellor at the Turkish Embassy in Ottawa, Canada.

Since 1996, Bilget has held senior executive positions in the private sector and is a Certified Public Accountant and Independent Auditor. He currently holds the position of Vice Chairperson of the Board of Directors at Salihli Organized Industrial Zone, is a member of the Izmir Economic Development and Coordination Board, and serves as the Chairperson of the Economy, Finance, and Finance Roundtable at ESIAD.

Ceyhun ARAZ

Member of Board of Directors

Ceyhun Araz completed his undergraduate and graduate studies in the Department of Industrial Engineering at Dokuz Eylül University. After his doctoral studies in supply chain management, he earned his Ph.D. from the same university. In 2010, Araz established the Department of Industrial Engineering at Manisa Celal Bayar University as an Assistant Professor. With over 40 academic publications and more than 1,500 international citations, Araz received the title of Associate Professor in Industrial Engineering in 2018.

Having held board memberships in various industry and technology companies, Araz joined the Board of Directors of Norm Holding in 2015.

 Ceyhun ARAZ

Mustafa Sabri DOĞRUSOY

Member of Board of Directors

After completing his undergraduate studies at the Faculty of Engineering at Yıldız Technical University, Mustafa Sabri Doğrusoy also completed his graduate studies in Business Administration at Istanbul University and in Computer Engineering at Yıldız Technical University. As a strategy and investment consultant, he provides consultancy to companies on management, organization, strategic planning, corporate structuring, and creating corporate culture.

Doğrusoy teaches courses in postgraduate and doctoral programs as a guest lecturer at universities, and continues his duties as a Member of the Advisory Board at a foundation university. He served as a board member at the Turkish Corporate Governance Association from 2015 to 2019, and since 2012, has served as an Independent Board Member in multiple listed companies in compliance with Capital Markets regulations.

Doğrusoy joined Norm Holding since 2020. In addition to his position as a Board Member of Norm Holding, he will serve as the Chair of the Sustainability Committee of the Holding starting in 2024.

 Mustafa Sabri DOĞRUSOY

Erkut ULUDAĞ

Board of Directors Consultant

Erkut Uludağ graduated from Kadıköy Anadolu Lisesi and went on to complete his degree in Civil Engineering at Istanbul Technical University (ITU). He earned both a master's in civil engineering and an MBA from the University of Michigan.

Uludağ began his career in 1993 in the automotive industry in the United States. Between 1997 and 2004, he worked at the global consulting firm Kearney's Chicago office, providing consultancy services to multinational companies in areas such as operational efficiency, cost improvement, mergers, strategy development, and sector-specific investments for private equity funds. From 2004 to 2012, he served as a managing partner at Roland Berger, a strategic consulting firm. Since 2013, he has been providing consultancy services in mergers, acquisitions, and strategy development through his own firm, EU Corporate Consulting.

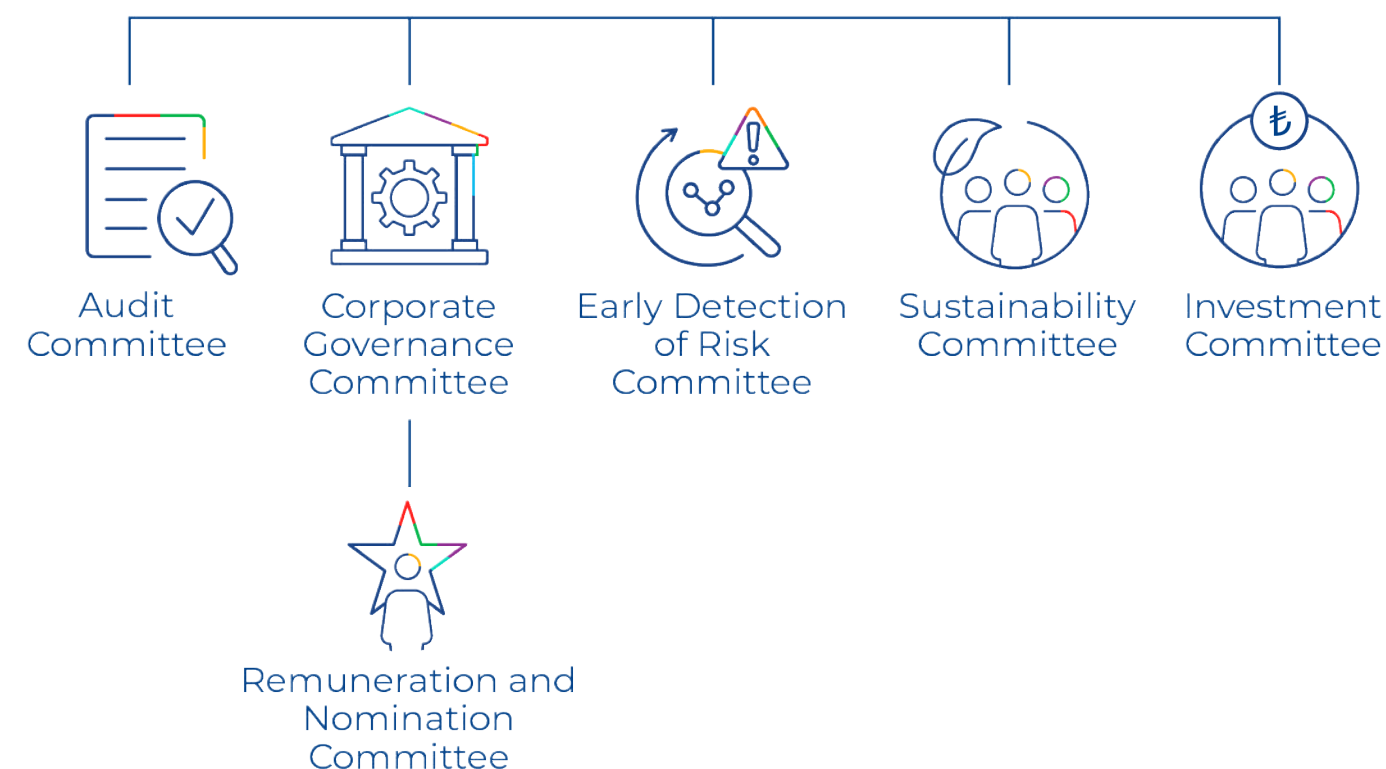
Uludağ has also held board memberships in various industrial companies and has served as an Advisor to the Board of Norm Holding since 2018.

 Erkut ULUDAĞ

BOARD COMMITTEES

As part of Norm Holding's corporate structuring strategy, six committees have been established within the Board of Directors, based on the Capital Markets Law and the OECD Corporate Governance Principles.

The Board Of Directors Committee



The committees provide recommendations within their areas of authority and responsibility regarding decision-making mechanisms. The final decision and responsibility always rest with the Board of Directors of Norm Holding. The scope, duties, and responsibilities of the committees are defined in **the Committees' Operating Principles**, which can be accessed on the Norm Holding website.

The frequency and dates of the committees' meetings are determined at the beginning of the year. The agenda is prepared by the Committee Chair, and it is distributed to the members by the Board of Directors Secretariat. Meeting number may be increased or extraordinary meetings may be held based on the agenda's intensity, as decided by the committee. The meeting outcomes, and an annual activity report are

presented to the Board of Directors. Additionally, the committees review their duties and operating principles and submit any necessary updates to the approval of the Norm Holding Board of Directors. Holding executives who are not Board members or external experts may be invited to temporarily participate in the committees. Furthermore, the committees may seek external professional consultancy on matters related to their activities, benefit from independent expert opinions, and conduct special reviews on managerial issues.

Audit Committee

Name, Surname	Committee Duty	Norm Holding Position
Muhittin BİLGET	Chair	Board of Directors Member
Ceyhun ARAZ	Member	Board of Directors Member
Mustafa Sabri DOĞRUSOY	Member	Board of Directors Member

The Audit Committee oversees the functioning and adequacy of the accounting, financial reporting, internal control systems and supervise internal and external audit processes for Norm Holding and its affiliated companies. Denetimden Sorumlu Komitenin çalışma esaslarına **The Committee's Operating Principles** can be accessed on Norm Holding's website.

The Committee consists of 3 members including the chair. It meets bi-monthly and may increase the frequency of meetings when necessary. In 2023, the Committee held six meetings, and the Board of Directors was updated on the Committee's activities on a quarterly basis. The Committee's activity report for 2023 was submitted to the Board of Directors in April 2024.

The Committee;

- Monitors compliance of Norm Holding and its affiliated companies to all regulations, primarily the Turkish Commercial Code, the Corporate Governance Principles of the Capital Markets Board, Public Oversight Accounting and Auditing Standards Authority regulations and Turkish Accounting Standards.
- Asses bi-monthly reports on the risk-based follow-up of internal audit findings.
- Ensures the effective and efficient execution and coordination of the independent audit processes for the Holding and its affiliated companies and communicates in written the independent audit firm's opinion to the Board of Directors.
- Plays a role in resolving potential disputes in financial matters, ensuring the preparation of financial reports, and verifying the accuracy of the information contained in the reports. It also provides the Board with recommendations for corrective actions when necessary.
- Oversees Corporate Risk Management activities. In 2023, a corporate risk management mechanism was implemented in three affiliated companies, and implementation is going to be expanded across other Norm Holding companies in 2024.

Corporate Governance Committee

Name, Surname	Committee Duty	Norm Holding Position
Mustafa Sabri DOĞRUSOY	Chair	Board of Directors Member
Muhittin BİLGET	Member	Board of Directors Member
Ceyhun ARAZ	Member	Board of Directors Member
Filiz ERGİN	Member	Executive Committee Member, HR Director
BelginTUNCCEL EVCİMEN	Member	Brand and Corporate Communication Director

The Corporate Governance Committee monitors the compliance of the Holding and its affiliated companies with the Turkish Commercial Code, the Corporate Governance Principles of the Capital Markets Board, the OECD Corporate Governance Principles, and local regulations. The Committee plays a key role in implementing practices that enhance Holding performance, ensuring effective communication with shareholders, reviewing systems and processes, and coordinating the establishment of appropriate committees. It works on performance evaluations, career planning, and public disclosures, defining principles and implementation guidelines, supervising their application, and presenting them to the Norm Holding Board of Directors. **The Committee's Operating Principles** can be accessed on the Norm Holding website.

The Committee consists of five members, including the Chairman. In 2023, four committee meetings were held, and the Board of Directors was updated on the committee's work every quarter. During the year, the Committee prepared and presented the Board of Directors' Goals, Performance Evaluation, and Efficiency Report. Additionally, it conducted the Executive Committee's performance evaluation and collaborated with the Executive Committee on the separation of Board and Executive Committee functions, meeting topics, and frequency. The Committee also supported the preparation of the sustainability report, working alongside the Sustainability Committee and the Executive Committee.

In the 2023 evaluation based on OECD and CMB principles which was conducted by an independent and accredited corporate governance and credit rating agency, Norm Holding received a score of 9.19 out of 10 for its compliance with the Corporate Governance Principles.

The Committee's activity report for 2023 was presented to the Board of Directors in April 2024.

Remuneration and Nomination Committee

Name, Surname	Committee Duty	Norm Holding Position
Mahmut ÖZTÜRK	Chair	Executive Committee Member, Head of Industrial Group
Caner MELEK	Member	Executive Committee Member, Head of Trade Group
Kumru TINAZ	Member	Executive Committee Member, Accounting and Finance Director
Filiz ERGIN	Member	Executive Committee Member, HR Director

Remuneration and Nomination Committee operates as a subcommittee of Corporate Governance Committee. It identifies senior and managerial roles within Norm Holding and its affiliated companies and makes appointment recommendations for these positions. The committee also coordinates the development and implementation of the compensation policy.

Committee consists of 4 members including the chair. Regular meetings are held in October and December. Additional meetings can be scheduled as needed. The meeting agenda is set by the Human Resources Director and the Board Secretariat, which also handles meeting invitations and distributes the agenda.



Early Detection of Risk Committee

Name, Surname	Committee Duty	Norm Holding Position
Erkut ULUDAĞ	Chair	Advisor to Board of Directors
Muhittin BİLGET	Member	Board of Directors Member
Mustafa Sabri DOĞRUSOY	Member	Board of Directors Member
Tevfik Gani ERPULAT	Member	Affiliated Company Board Member
Mahmut ÖZTÜRK	Member	Executive Committee Member, Head of Industrial Group
Caner MELEK	Member	Executive Committee Member, Head of Trade Group

Early Detection of Risk Committee is responsible for establishing and implementing Corporate Risk Management mechanism in Norm Holding and its affiliated companies. This includes overseeing the regular review and evaluation of the systems and processes created within the Holding and its affiliated companies. The Committee monitors economic, environmental, social, geopolitical, and technological risks.

Comprising five members, including the Chair, the Committee meets quarterly, with meeting frequency adjusted as needed based on agenda. The Chair sets the meeting agenda, which the Board Secretariat then distributes to members. **The Committee's Operating Principles** are available on Norm Holding's website.

Reports detailing Committee activities and meeting minutes are regularly submitted to the Board of Directors. In 2023, the Committee convened five times, providing quarterly updates to the Board. The annual activity report on 2023 operations was presented to the Board in April 2024.



Sustainability Committee

Name, Surname	Committee Duty	Norm Holding Position
Mustafa Sabri DOĞRUSOY	Chair*	Board of Directors Member
Ceyhun ARAZ	Member	Board of Directors Member
Duygu UYSAL SİMROOĞLU	Member	Board of Directors Member

** Duygu Uysal Simrooğlu served as Committee Chair from January 1 to December 31, 2023. As of January 1, 2024, Mustafa Sabri Doğrusoy has taken over the role of Committee Chair.*

Sustainability Committee was founded in 2021 to enhance Norm Holding and its affiliated companies' performance in environmental, social and governance areas aligning with the SDGs to support the Holding's sustainable growth. **The Committee's Operating Principles** are accessible on the Holding's website.



The Committee, consisting of three members including the chair, holds monthly meetings. The frequency of meetings can be increased by Committee decision. In 2023, the Committee held 12 meetings, with quarterly reports provided to the Board of Directors on its

activities.

The Committee manages the processes of development of sustainability strategies and targets of Norm Holding and its affiliated companies, in alignment with SDGs. The Committee oversees the development and implementation of Norm Holding's sustainability policy and coordinates communication with stakeholders, including employees. It provides recommendations to the Board for ensuring compliance with labor regulations, occupational health and safety regulations, and environmental legislation, while aiming to enhance the performance of the Holding and its affiliated companies in line with global best practices.

The Committee actively collaborates with civil society organizations in Türkiye and globally to stay informed on best practices and increase the impact of sustainability initiatives. As part of this commitment, Norm Holding participates intensively in the UNGC Türkiye network activities.

To achieve its sustainability goals, the Committee has established working groups composed of skilled and knowledgeable members. Initially, five groups were formed in the areas of R&D and Innovation, Environment, Digital Transition, People and Society, and Corporate Governance. In 2024, strategic efforts led to refining the groups to four, focusing on Environment, R&D and Innovation, People and Society, and Sustainable Supply Chain.

These groups are responsible for developing and implementing action plans, monitoring performance, updating actions as needed, and fulfilling all tasks assigned by the Committee. Each group's annual work plan is carefully reviewed, and responsibilities are allocated along with a schedule of activities for the year.

Since 2020, Norm Holding has published an annual Sustainability Report to the public as part of the Committee's initiatives.

The report of activities carried out in 2023 was presented to the Board in April 2024.



Investment Committee

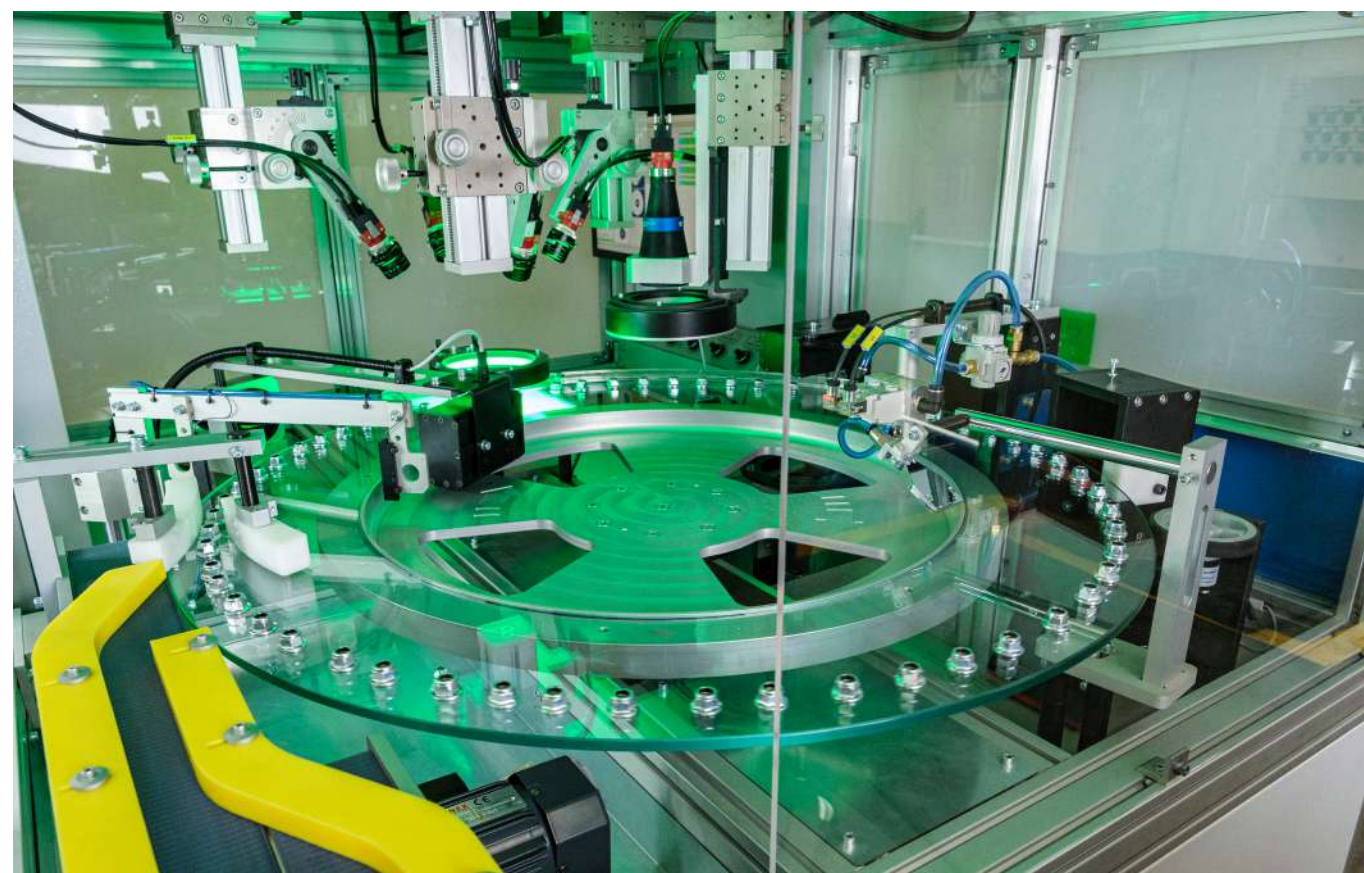
Name, Surname	Committee Duty	Norm Holding Position
Nedim UYSAL	Chair	Vice-Chairperson and CEO
Muhittin BİLGET	Member	Board of Directors Member
Erkut ULUDAĞ	Member	Advisor to Board of Directors
Mahmut ÖZTÜRK	Member	Executive Committee, Head of Industrial Group
Kumru TINAZ	Member	Executive Committee Member, Accounting and Finance Director

The Investment Committee reviews investment proposals from Norm Holding and its affiliated companies, assessing each from both a regulatory and financial standpoint. The Committee analyzes

the impact of investments on operations, ensuring alignment with regulations, and oversees feasibility, including incentives and grants. The Committee's recommendations are presented to the Board.

The Committee is responsible for identifying strategies to enhance the Holding's competitive edge, formulating investment programs, and establishing systems to monitor investment performance against set criteria. It also tracks the management of strategies and projects approved by the Board.

Comprising five members, including the chair, the Investment Committee convenes quarterly. Meeting frequency can be increased based on the Committee's discretion.



Robotics and automation investments within the scope of operational excellence in Norm Holding and its affiliated companies continued in 2023.

EXECUTIVE BOARD AND EXECUTIVE BOARD COMMITTEES

Name, Surname	Committee Duty	Norm Holding Position
Nedim UYSAL	Chair	Vice-Chairperson and CEO
Mahmut ÖZTÜRK	Member	Executive Committee Member, Head of Industrial Group
Caner MELEK	Member	Executive Committee, Head of Trade Group
Kumru Tınaz	Member	Executive Committee, Finance and Accounting Director
Filiz ERGİN	Member	Executive Committee, HR Director
Erkan YENİÇARE	Member	Technology and Digital Transformation Director

Duties and responsibilities of the holding Executive Board are defined in **Executive Board Working Principles** document. At the beginning of each year, the Committee's targets are set with the approval of the Board of Directors. At the end of each year, an efficiency report is prepared by the Executive Board and presented to the Board and shareholders.



In accordance with the Board, Norm Holding has established the **Financial Affairs and Finance Committee**, the **Business Development Committee**, and the **Procurement Committee**. These committees operate within their areas of authority and responsibility and provide recommendations on decision-making mechanisms when necessary. However, the final decision and responsibility always lie with the Executive Board of Norm Holding.

Committee assignments are made based on the knowledge and experience of potential members. The duties and operating principles of all committees are documented in writing.

The regular meeting periods of the committees are determined at the beginning of the year. The frequency of meetings can be increased based on the committees' decision, depending on the agenda. The Committee Chair determines the meeting agenda, and committee members can suggest topics to be included on the agenda by informing the Chair. The agenda is distributed to members by the Secretariat of the Board of Directors.

Committees' activities are documented and recorded. Outcomes of meetings are reported to the Executive Board, and relevant reports are escalated to the Board.

At the end of each year, committees prepare an activity report and review their duties and operating principles. Any necessary updates are submitted to the Board of Directors for approval.

If needed, employees of Norm Holding or external experts can be invited to committees' meetings. Based on the committees' decision, executives of Norm Holding who are not Board members or external experts may be temporarily assigned to the committees.

Financial Affairs and Finance Committee

Since its establishment in 2022, the Financial Affairs and Finance Committee has been providing written evaluations and opinions to the Executive Board of Norm Holding, primarily concerning the financial situation of Norm Holding and its affiliated companies.

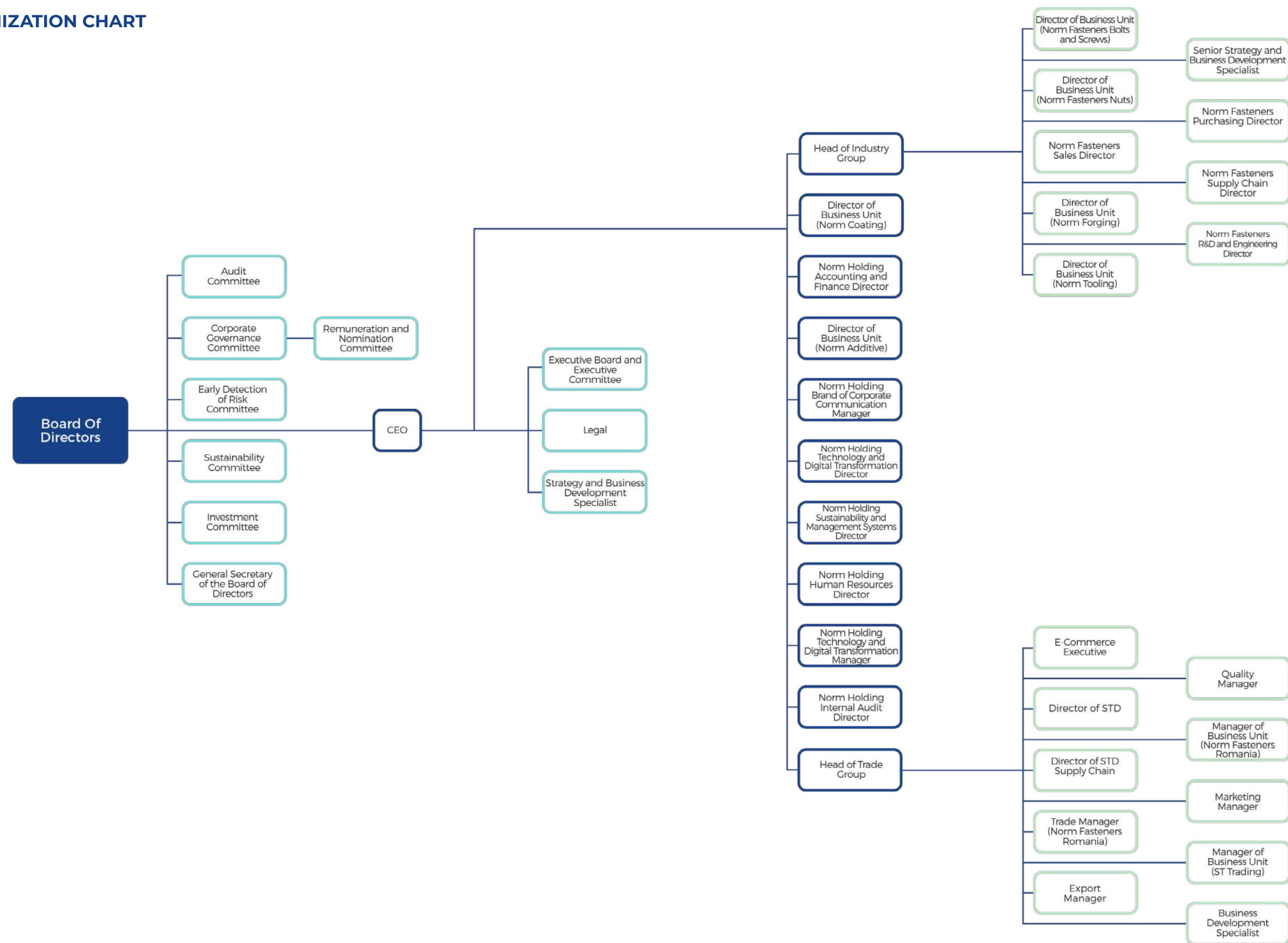
Business Development Committee

Since it was established in 2022, Business Development Committee has been analysing business development opportunities in line with strategies of Norm Holding and its affiliated companies and providing its written analysis and evaluations to the Executive Board.

Procurement Committee

The Procurement Committee works on optimizing costs, improving quality, and enhancing the efficiency of procurement processes by overseeing all procurement activities and transaction follow-ups for Norm Holding and its affiliated companies.

ORGANIZATION CHART



CORPORATE RISK MANAGEMENT

The Risk Early Warning Committee, which reports to the Board of Directors, is the highest body responsible for the company's risk management practices. While the Committee evaluates the risks and opportunities of Norm Holding and its affiliated companies, the Internal Audit Department, appointed by the Audit Committee, periodically reviews and reports on internal risks. The Committee aims to disseminate corporate risk management and internal control activities throughout the organisation, increase risk awareness and ensure traceability by creating a common risk perception.

The Committee reviews the assessment of financial, economic, geopolitical, environmental and social risks on an annual basis. The review covers global risks, country risks and business risks. When identifying risks and opportunities, the Committee considers global and local analyses, in particular the World Economic Forum (WEF) Risk Report, as well as feedback from business units and functions.

The 2023 study identified 26 potential risks. Following a probability-impact analysis, 17 of these were classified as critical risks and action plans were prepared by the relevant units. Progress reports on the action plans were submitted to the Committee on a quarterly basis. For low level risks, risk scores and trends were reviewed at quarterly committee meetings. In addition, risk assessments are carried out as part of the environmental, health and safety and energy management systems.

In 2023, as part of the holding's risk management activities, earthquake analyses and action studies have also been carried out in the regions where the holding operates. The earthquake risk is monitored at the critical risk level. The earthquake resistance of the Holding's buildings is being assessed with studies initiated in July 2023. The studies will be continued in 2024. In cooperation with AKUT, training on what to do in the event of an earthquake has been carried out at all sites, and material lists and costs for search and rescue teams have been determined. Emergency plans for fire, earthquake, flood, etc. have been drawn up for each facility.

Management of Environmental, Social and Governance (ESG) Risks

The 2023 Risk and Opportunity Study identified acute and chronic changes in weather conditions due to climate change as the most significant sustainability risk. Changes in weather conditions carry the risk of rising commodity prices, global inflation and supply shortages. In order to minimise the impact of this risk

on the Holding's operations, the sources of supply for all product groups have been geographically and geopolitically diversified and alternative logistics solutions have been evaluated.

Risks in the process of transition to low carbon economy and especially Carbon Border Adjustment Mechanism (CBAM) of European Union (EU) and relevant regulations have been assessed in the study. Within the scope of management of transition risks, energy efficiency and renewable energy investments as well as R&D investments to develop low carbon emission products are prioritized. You can access projects and performance of Norm Holding in this subject in Planet Matters and Technology Matters sections of the report.

As part of this, the Company participated in the Business and Human Rights Accelerator programme organised by the UNGC. A due diligence risk assessment to identify ethical and human rights risks in the value chain has been initiated.

Studies on social risks focus on risks related to ethical and human rights violations in the value chain. The Ethics and Human Rights Risk Assessment process is carried out in collaboration with the Sustainability, Human Resources and Internal Audit departments and the Ethics Committee. The project identifies risks and root causes. Risks are assessed in terms of likelihood and impact, and affected stakeholders are identified. An action plan will be developed to prevent risks or minimise their impact. Work on the project is planned to continue in 2024.

Corporate Risk Management Project

The Holding has initiated the Corporate Risk Management Project with the aim of integrating risk analysis processes into business processes in 2022. The project started in Norm Fasteners Nuts Izmir, Norm Tooling STD as pilot companies in 2022 and in 2023 Norm Fasteners Bolts Izmir, Norm Fasteners Nuts Salihli and Norm Coating Izmir have been included in the project.

Within the scope of the project, companies identify risks in their business processes and create a control environment to remove or if this is not possible to minimize the impact of risks. Root cause analysis and impact-result assessment are done for potential risk identified in business processes and necessary action plans are defined. Risks and action plans are monitored through Integrated Management System (QDMS). The Project will be expanded accross the entire holding in 2024.

ETHICS AND COMPLIANCE

Name, Surname	Committee Duty	Norm Holding Position
Mustafa Sabri DOĞRUSOY	Chairperson	Board of Directors Member
Duygu UYSAL SİMROOĞLU	Deputy Chairperson	Board of Directors Member
Mahmut ÖZTÜRK	Member	Executive Committee Member, Head of Industrial Group
Caner MELEK	Member	Executive Committee Member, Head of Trade Group
Kumru TINAZ	Member	Executive Committee Member, Finance and Accounting Director Executive
Filiz ERGIN	Member	Executive Committee Member, HR Director
Fatih ÖZGÜR ÇAYIR	Board Secretary	Internal Audit Manager
Yıldız SEHER ÜÇER	Board Secretary	Internal Audit Manager

**As of June 1, 2024, Yıldız Seher Üçer has transitioned her role to Fatih Özgür Çayır.*

Code of Ethics Operations Policy defines the ethical approach of Norm Holding and its affiliated companies. The responsibility for ensuring the policy is updated, when necessary, lies with the Internal Audit Department of the Holding. All updates are made following the evaluation by the Executive Board and the approval of the Board of Directors.

The policy is supported by **Conflict-of Interest Policy, Gifts and Hospitality Policy, Notice and Notification Policy, and Anti-Bribery and Anti-Corruption Policy. Policy can be accessed on Norm Holding website.**

The Code of Conduct document outlines the rules that must be followed to foster respectful, honest, and responsible business relationships, and to create a safe and harmonious work environment.

The Ethics Committee is responsible for guiding employees to adhere to the Code of Conduct and related policies. In cases of ethical violations, the Committee investigates and resolves the issue.

The Ethics Committee consists of the chair, vice chair, 4 members, and a secretary. The Committee meets quarterly, and the agenda for each meeting is shared by the secretary. Additionally, the secretary keeps a record of all notifications received through the ethics hotline, reports them to both the Ethics Committee and the Board of Directors, and archives them.

Any suspicion of violation of ethics can be notified through the ethics hotline in Norm Holding and its affiliated companies.



Reports can be made via email (normholding@etikhat.com.tr) or by phone (444 3845). All reports are reviewed in accordance with confidentiality principles. Information about the operating principles of the Ethics Hotline is provided in the Code of Ethics Operations Policy.

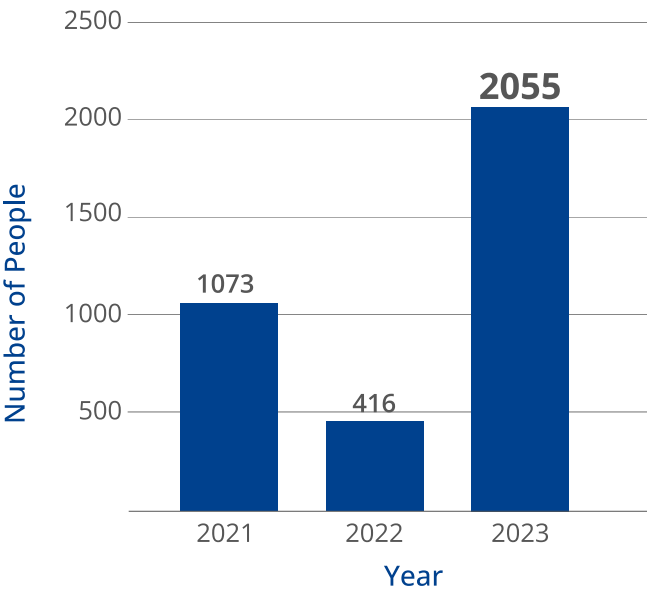
The Ethics Hotline is managed by an independent service provider. The reports received are communicated to the Norm Holding Ethics Committee. The Committee Secretary informs the committee, the person making the report, and the relevant manager about the process to be followed, depending on the content of the report. If the content of the report requires an investigation, it is referred to the Internal Audit Department. If a report is made concerning any member of the committee, the matter is evaluated in a meeting where the concerned member is not present, the process is initiated, and the CEO is informed. If the report involves the CEO, the matter is forwarded to the Chair of the Board. The outcome of the evaluation is reported to the Board of Directors. The Ethics Committee issues a recommendation decision within a maximum of one month, and the necessary actions are communicated to the relevant company officials. The person who made the report is also informed about the matter.

The Committee Secretary is responsible for concluding all reports received through the Ethics Hotline. The Committee Secretary also ensures the operation of the committee, the distribution of meeting materials to members before meetings according to the agenda, and the maintenance and storage of these materials in accordance with confidentiality principles.

During the 2023 reporting period, 39 reports were received by the Ethics Committee, all of which were resolved. Among these, there were no reports related to discrimination.

To embrace Norm Holding's ethical approach and rules, 2,055 employees in Norm Holding and its affiliated companies received ethics training in 2023.

Persons Completing Ethics Training



INTERNAL AUDIT

The internal audit processes conducted by Norm Holding’s Internal Audit Department, under the mandate of the Audit Committee, provide independent and objective assurance regarding the effectiveness of operations, reliability of financial data and reporting, and compliance with regulations for both the Holding and its affiliated companies.

Based on risk analyses, the Internal Audit Department evaluates the management and control structures of the Holding and its affiliated companies, with due consideration given to fraud risks during audits.

For each finding identified during audits, auditors assess the risk level by considering its impact and likelihood. Additionally, action plans are agreed upon with process owners for each specific finding, and a target date is set for resolution. These action plans are entered into the QDMS system, where they are tracked and monitored.

The Internal Audit Department reports the current status of findings identified during audits, along with agreed-upon actions, to the Audit Committee every four months. When necessary, process owners are invited to the Audit Committee to present detailed updates on the actions they have taken in response to specific findings.

In 2023, six process audits were conducted.

ANTI-CORRUPTION AND ANTI-BRIBERY APPROACH

Norm Holding upholds a strict “Zero Tolerance” approach to bribery and corruption, as outlined in both the Ethical Code of Conduct and the **Anti-Bribery and Anti-Corruption Policy**. The Holding’s policy reaffirms its commitment to full compliance with anti-bribery regulations and principles and provides clear guidance on identifying and preventing potential bribery and corruption cases. Updates to the policy, when necessary, are conducted by the Human Resources Department, following input from the Ethics Board and Internal Audit Department, and are subject to approval by the Executive Committee and the Board of Directors.

In alignment with this policy, employees of Norm Holding and its affiliates are prohibited from providing gifts, meals, travel, or entertainment to influence business decisions or gain an undue advantage. Except under specific circumstances outlined in **the Gift and Hospitality Policy**, offering gifts to public officials or accepting gifts from third parties is not permitted. Additionally, donations or grants intended to improperly influence a public official or secure benefits are strictly forbidden.

Contracts with third parties acting on behalf of Norm Holding and its subsidiaries must adhere to all applicable anti-bribery and anti-corruption regulations. Furthermore, employees are strictly prohibited from entering into personal financial relationships with third parties.

To mitigate bribery and corruption risks, risk-based due diligence is conducted before establishing partnerships, acquisitions, or other strategic investments. Supplier relationships are similarly subject to risk-based due diligence both before and throughout the business relationship. Business relationships are only initiated if there is a legitimate business need for the service or product, if pricing is within market rates, and if due diligence on third parties yields satisfactory results.

In alignment with anti-corruption and ethical principles, Norm Holding and its affiliated companies report their financial statements transparently and accurately according to global accounting standards and financial and tax regulations. Any discrepancies or misstatements are reported to the Internal Audit Department and the Ethics Committee for further action.

As stated in the Norm Holding Disciplinary Regulation, behaviors such as breach of trust, theft, and similar actions are grounds for immediate dismissal. In such cases, disciplinary and legal processes are initiated accordingly.

Any suspicion regarding ethical violations, bribery or corruption may be reported to Norm Holding’s ethics hotline. During the reporting period, there were no public cases or lawsuits related to bribery or corruption.

COMBATTING ANTI-COMPETITIVE PRACTICES

As part of the Code of Ethics, Norm Holding and its affiliated companies are committed to the principles of fair competition. Fair competition and intellectual property protection are upheld, safeguarding the rights of employees and business partners within the framework of competition regulations. Within the Holding, there is zero tolerance for practices like monopolization or collusion that unfairly disrupt market conditions, leading to unfair competition or legal violations.

The Holding’s **Intellectual and Industrial Property Rights Policy** defines the principles, rights, and obligations concerning the protection of employees’ intellectual and industrial property rights.

In 2023, no cases of violation of Non-Compete Rule were reported in relation to transactions conducted by Board members on behalf of the company or third parties.

INFORMATION SECURITY

In Norm Holding and its affiliated companies, personal information of employees, customers, suppliers and other business partners are recorded and protected in accordance with the national and international regulations. The Holding’s approach and rules on information security are outlined in the Information Security Policy and **the Information Security Roles and Responsibilities Procedure**.

An information security management system has been established in compliance with the ISO 27001 certification obtained in 2016. Programs, networks, and folders are designed to grant access only to authorized employees with relevant responsibilities. The confidentiality of personal and commercial information is strictly maintained in any sharing with third parties.

Within the framework of the information security management system, information security risks related to business processes are identified and managed systematically. Additionally, specific security measures tailored to the automotive supply chain are defined, and core information security controls are implemented to meet customer requirements.

Improvements are planned to ensure that Norm Holding’s core and supportive business activities continue with minimal disruption. Training sessions are held to enhance technical and behavioral competencies, aiming to raise information security awareness. In cases of policy violations, disciplinary and legal actions are pursued.

TAX MANAGEMENT

Norm Holding fully complies with local regulations in accountability and transparency and fulfills its tax obligations timely and completely. It effectively cooperates with public authorities.

All financial activities of the Holding are audited by certified financial advisors and independent auditors. This audit process ensures the accuracy and reliability of financial statements while enhancing transparency in financial reporting.

The Finance and Financial Affairs Committee, established in 2022 under the Executive Committee, supports strategic decision-making by assessing the financial standing of Norm Holding and its subsidiaries and analyzing the impact of incentives on performance. Tax strategy and implementation are overseen by the Finance and Financial Affairs Directorate, which is staffed by experts who continuously monitor tax legislation, respond quickly to changes, and implement necessary actions in a timely manner.

Profit distribution and allocation of reserves are conducted in compliance with tax regulations, the Turkish Commercial Code, and the Shareholders Agreement. The dividend distribution proposal prepared by the Board of Directors is submitted for the approval of the General Assembly, which decides on the method and timing of distribution. **The Dividend Distribution Policy** is available on the Norm Holding website.

Adopting a **holistic perspective** on sustainability, we base our Future Matters approach on the United Nations (UN) Sustainable Development Goals (SDGs).



NORM HOLDING AND SUSTAINABILITY: FUTURE MATTERS

STAKEHOLDER ENGAGEMENT AND MATERIALITY MATRIX

Stakeholder Engagement

In line with the strategy of effective cooperation and communication with stakeholders, Norm Holding and its affiliated companies adopt the Stakeholder Capitalism Metrics developed by the World Economic Forum (WEF). With an open, transparent and constructive approach to relationships, the company aims to balance the values, needs and expectations of stakeholders with the goals of Norm Holding.

When determining sustainability strategies and goals, Norm Holding takes into consideration the opinions and expectations of all its stakeholders.

Continuous and efficient communication with stakeholders is maintained through various platforms and tools. Stakeholder analysis is used in the identification and implementation of the communication strategies of the affiliated companies. After all affiliated companies have identified their stakeholder communication strategies according to their specific needs, a consolidated stakeholder communication map is created throughout the Holding.



Stakeholder Communication Map

Stakeholder Group	Communication Frequency	Dialogue Platform
Employees	Every weekday	Mailing
		Intranet (mobile and web)
	1 in 3 months	N'Haber magazine
	Every day	Screens
	1 in 2 years (DGA)	Employee engagement research and surveys
		Surveys on different topics issued every month
	1 in 3 months	Focus groups
	Every month	Reward system (seniority rewards)
Media	4 times a year	Performance Management System (PMS)
	Annually	Annual report and sustainability report
	Twice a month	Press releases
	Once a month	Interview and talks
	1 in 2 months	Meetings and talks
	When necessary	Special case statements
	Continuously	Training and technical support
		Sponsorships
Vocational Schools, Universities and Academy	Annually	Annual report and sustainability report
	Continuously	Academic congresses and seminars
		Meetings and talks
		Joint projects
		Articles and publications
		Joint research
	Annually	Annual report and sustainability report
	Continuously	Work groups
Norm Holding Companies		Project partnerships
	Annually	Annual report and sustainability report audits
	When necessary	Meetings and talks
		Trainings
	At least once a year	Joint projects (TUBİTAK-İBB)
	Annually	Annual report and sustainability report
	When necessary	Meetings and talks
		One-on-one interviews
Suppliers and Subcontractors	1 in 2 months	OHS committees
	Continuously	Award ceremony
	Annually	Trainings
	Continuously	Annual report and sustainability report working groups, committee and Board of Directors memberships
		Memberships
		Joint projects and initiatives
		Meetings and talks
Non-Governmental Organizations		

Material Topics and Materiality Matrix

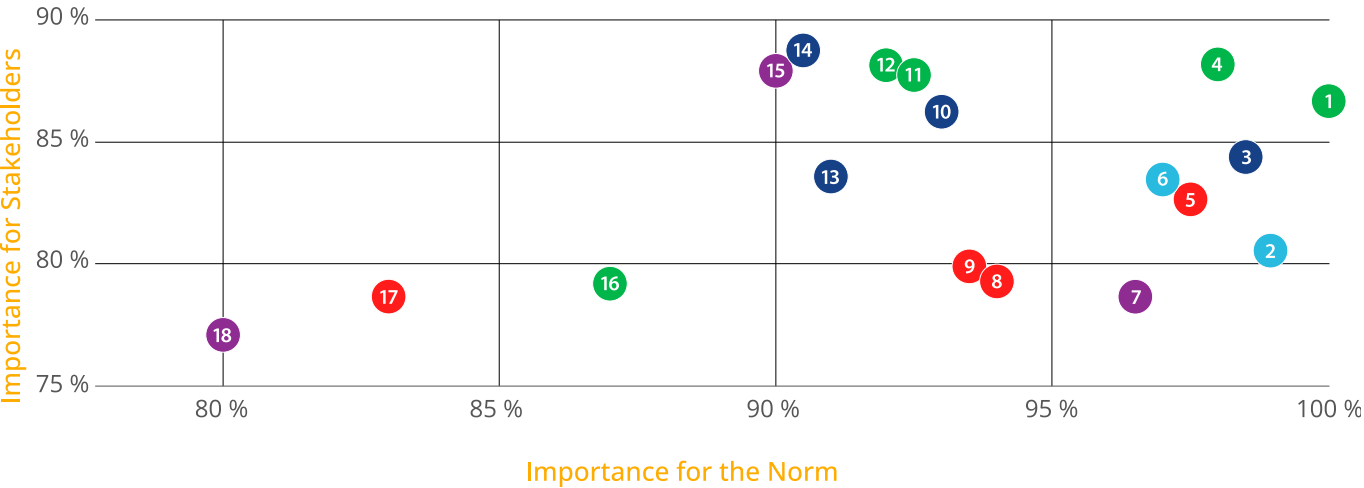
Holding identifies sustainability topics of importance to all stakeholders and their ecosystems and drivers through stakeholder engagement and a materiality matrix. The outcomes of this analysis guide the Company’s sustainability strategy, goals, plans and reporting.

The Stakeholder Engagement and Materiality Matrix generated in 2021 has been updated in 2024. The analysis included a detailed review of the Sustainability Accounting Standards Board (SASB) Engagement Guide, sector and industry developments, peer organisations, sustainability reporting standards, material sustainability topics from the previous

period, reports from global organizations and examples of best practice, and identified 18 topics for stakeholder engagement.

Stakeholders and their potential impacts have been identified through a mapping analysis. Stakeholder opinions were gathered through online surveys. White-collar employees, customers, business partners, suppliers, academia and financial institutions were included in the analysis. A total of 246 stakeholders took part in the analysis, of which 18 were international.

The materiality matrix was created by scoring ESG topics on two axes: **Importance for Stakeholders** and **Importance for Norm Holding**.



- Very High Materiality

 - 1 Transition to Low Carbon Economy
 - 2 Twin Transition (Digital and Green Transition)
 - 3 Corporate Governance and Transparency
 - 4 Efficient Use of Resources
 - 5 Occupational Health and Safety and Employee Well-being
 - 6 Circular Product- Process Design and Innovation
 - 7 Sustainable Supply Chain Management
- High Materiality

 - 8 Diversity, Equity, and Inclusion
 - 9 Human Rights
 - 10 Information Security
 - 11 Air Quality
 - 12 Water Efficiency and Wastewater Management
 - 13 Business Model Resilience and Risk Management
 - 14 Business Ethics
 - 15 Customer Satisfaction
- Medium Materiality

 - 16 Biodiversity Protection / Ecologic Impact
 - 17 Contribution to Socioeconomic Development
 - 18 Responsible Investment Approach

Very High Material Topics	Related Section	Associated SDGs
1. Transition to Low Carbon Economy	Energy and Emission Management	
2. Twin Transition (Digital and Green Transition)	Technology Matters	
3. Corporate Governance and Transparency	Corporate Management	
4. Efficient Use of Resources	Planet Matters	
5. Occupational Health and Safety and Employee Well-being	Human Matters	
6. Circular Product- Process Design and Innovation	Responsible Investments Planet Matters Technology Matters	
7. Sustainable Supply Chain Management	Supply Chain Management	

High Material Topics	Related Section	Associated SDGs
8. Diversity, Equity, and Inclusion	Diversity, Equity, and Inclusion	   
9. Human Rights	Human Matters	   
10. Information Security	Information Security	   
11. Air Quality	Planet Matters	
12. Water Efficiency and Wastewater Management	Water Management	 
13. Business Model Resilience and Risk Management	Corporate Risk Management	 
14. Business Ethics	Ethics and Compliance	
15. Customer Satisfaction	Customer Satisfaction	
Medium Material Topics	Related Section	Associated SDGs
16. Biodiversity Protection / Ecologic Impact	Planet Matters	 
17. Contribution to Socioeconomic Development	Social Contribution	    
18. Responsible Investment Approach	Responsible Investment	 

NORM HOLDING VALUE CHAIN

Norm Holding Approach and Inputs

Norm Holding strives to ensure that its corporate goals, business ethics approach and service quality goals are clearly communicated and integrated into the business model at every step of the value chain. It aims to maximize customer satisfaction and loyalty. Within this scope it regularly monitors its performance and continues its efforts in development areas.

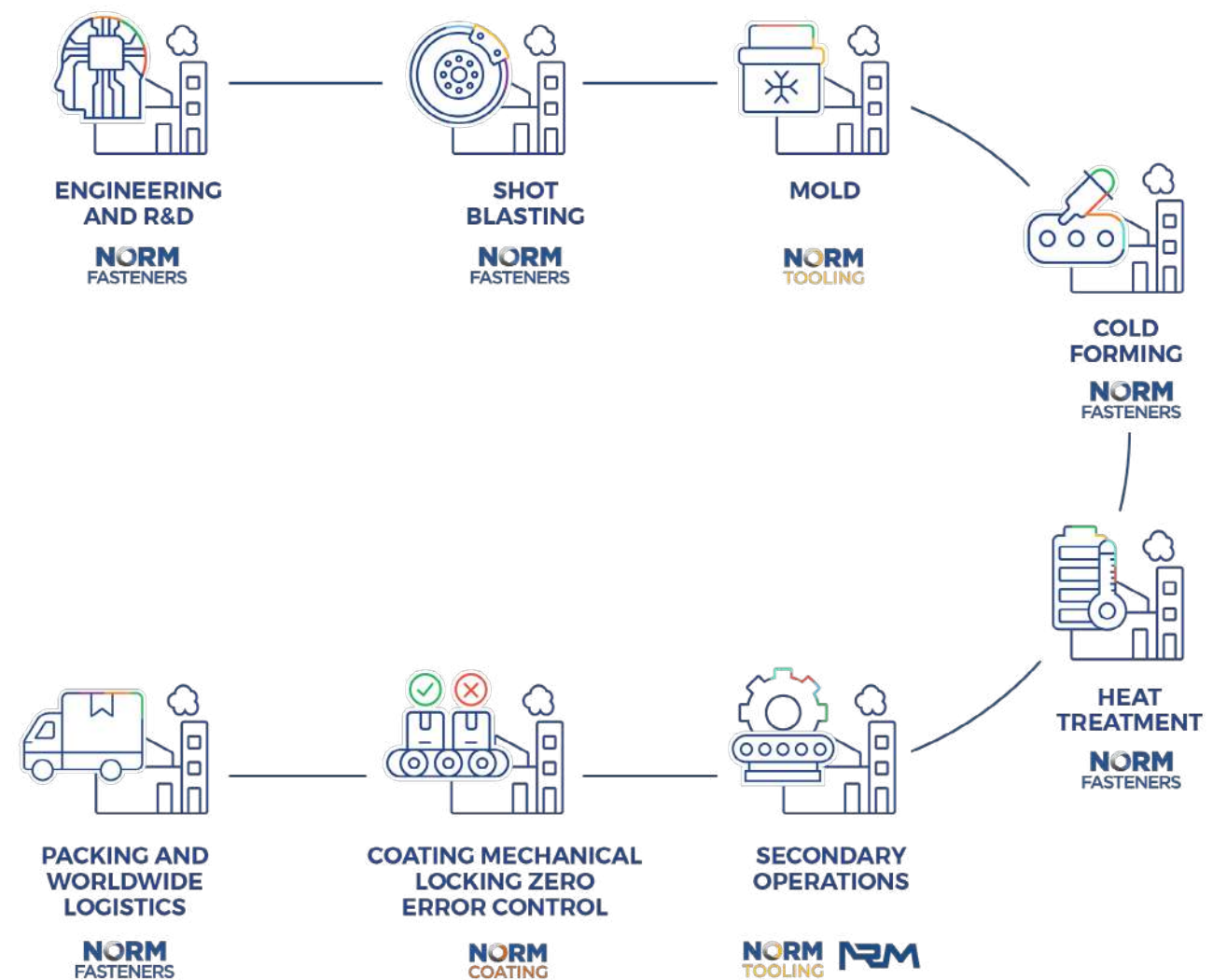
Outputs

Norm Holding strictly adheres to its objectives of complying with the waste and energy management principles required for climate neutrality, the framework for which has been determined by scientific studies, to reduce all environmental impacts of its activities, to protect water resources and to reduce waste.

Holding prioritizes all its stakeholders within its ecosystem to adapt to the future shaped by the technology and to develop capabilities required to maintain their competitiveness.

Norm Holding aims to manage the impacts it has throughout the value chain in a comprehensive manner.

Value Generation and Performance



SUSTAINABILITY APPROACH

FUTURE MATTERS

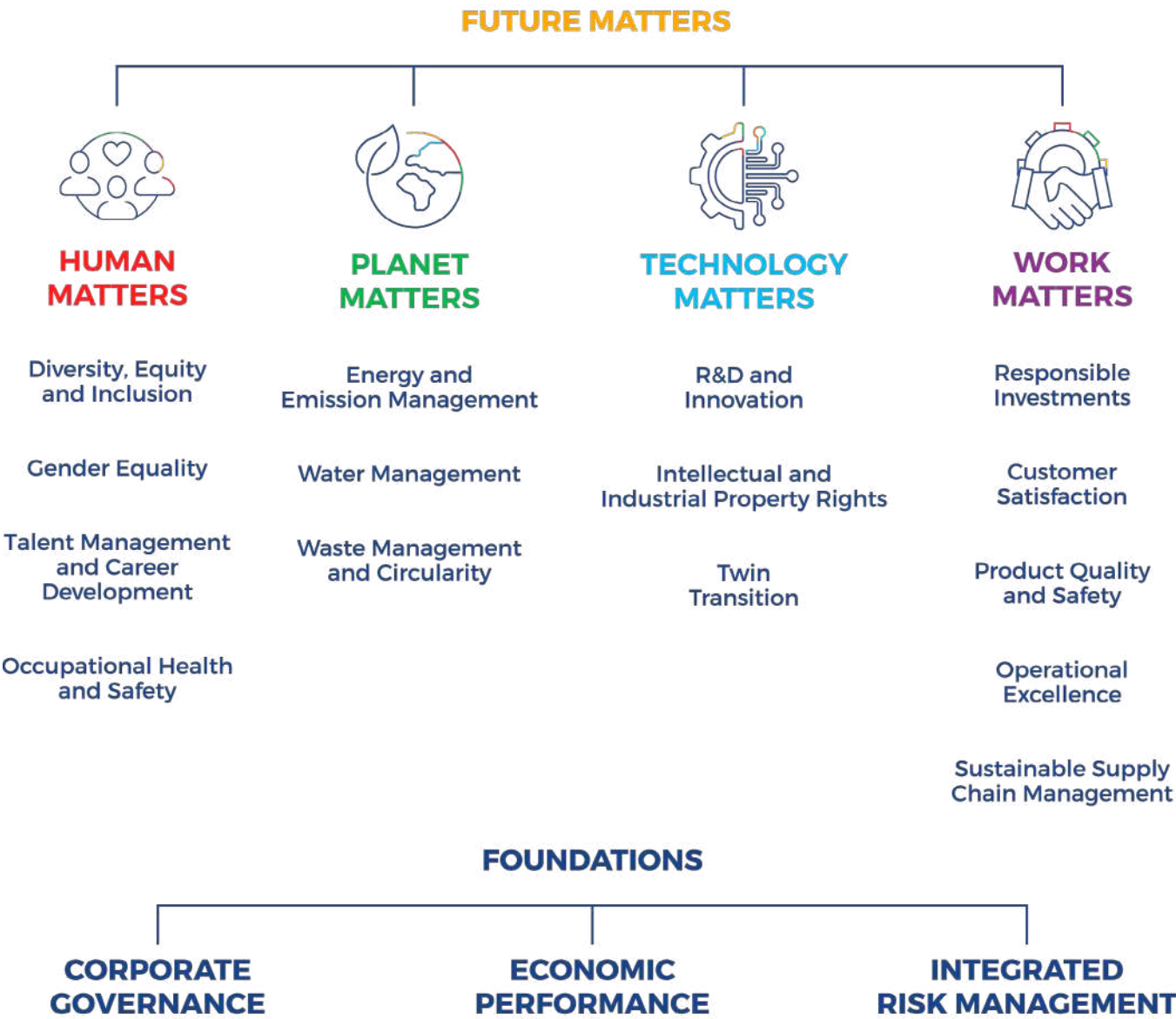
Norm Holding has built its sustainability approach on corporate governance, economic performance, and integrated risk management.

Within the framework of corporate governance, it promotes a management understanding that is transparent, accountable, traceable, and committed to ethical values across the entire value chain.

The company aims to continuously improve its financial performance and potential for sustainable growth. In this regard, it integrates sustainability priorities into its strategic decisions to achieve long-term success.

With sustainable and responsible investments, it seeks to create value, achieve cost-effectiveness, and secure a competitive advantage. Through integrated risk management, it identifies potential risks and develops strategies to minimize them, while managing sustainability risks.

Norm Holding, based on these three key pillars, presents its sustainability approach under the framework of **“Future Matters”**, encompassing the headings of **“Human Matters”**, **“Planet Matters”**, **“Technology Matters”**, and **“Work Matters”**.



Human Matters

Focusing on gender equality, diversity, equity and inclusion, and quality education, Norm Holding's Human Matters approach aims to create an ecosystem that offers equal opportunities for all, ensuring fairness, safety and decency, while developing the skills to meet the needs of the future.

Norm Holding increases its standards continuously to create a safe and healthy environment for its employees with zero occupational accident goal. Employee development is supported with programs and trainings.

As an active supporter of SDG 4: Quality Education, the Holding invests in the education and employment of youth in order to contribute to sustainable development and to ensure the training of qualified employees that the sector needs now and in the future.



Planet Matters

With the Planet Matters approach, Norm Holding is committed to minimizing its environmental impact and actively contributing to the fight against climate change. As part of this, the Holding continues its efforts to transition to a low carbon economy, preserve fresh water sources and manage water efficiently, and manage waste in accordance with circular product and process design.

Holding supports SDG 13: Climate Action and sees the transition to a low carbon economy as an element of its strategy. Within this framework, Norm Holding has set emission reduction targets. The Holding is accelerating energy efficiency projects, investing in renewable energy sources and low carbon product and process design. It is working on a comprehensive decarbonization strategy and action plan.



Technology Matters

Sustainable financial success and increasing competitive power of the companies lies in technology, R&D and innovation. With Technology Matters approach, Norm Holding continues its effort in twin transition, circular product and process design and R&D and innovation operations in its ecosystem.

As part of Technology Matters, investments are made in low carbon emission, circular product and process design to manage risks arising from the transition to a low-carbon economy, and R&D and innovation capacity is increased.

With twin transition, it is aimed to execute digitalization and green transition so that they support each other. The Holding puts twin transition at the center of its strategy of adding matters to technology. Digital technologies and automation processes make production processes more efficient and enable resource and energy efficiency.

Thus, the environmental impact of production and distribution processes are reduced. On the other hand, efforts for twin transition and developing sustainable technologies increase the capability of the labor force and competitive strength of the company.



Work Matters

Work Matters is the reflection of Norm Holding's responsible production and investment perspective. Assuming that financial success can only be sustainable when it is the result of a production model that adds value to the environment and the society, Norm Holding's Work Matters approach has the following elements:

- Assessing investments with their environmental and social impact within the frame of responsible investment approach
- Extending corporate governance principles throughout the value chain.
- Continuously improving product quality and safety,
- Creating sustainable, technological and innovative solutions to meet customer expectations and satisfaction,
- Increasing operational perfection and efficiency,
- Reducing environmental impact of the value chain and creating a sustainable supply chain to improve social performance,
- Reducing input-based emissions,
- Supporting the development of stakeholders in the ecosystem.



SUSTAINABILITY STRATEGY

Norm Holding has adopted sustainability as the umbrella strategy for the Holding in 2023-2024 strategy efforts. Based of the Holding strategy works and materiality matrix updated in 2024, the sustainability strategy has been renewed and 2024-2028 Sustainability Strategy has been prepared.

Because combating climate change is urgent and cannot be delayed, the Transition to Low Carbon Economy became prominent in the sustainability strategies. Efforts to reduce carbon emission and Resource Management will not only enable Norm Holding to manage its costs better, but it will also reduce transition risks such as CBAM. On the other hand, it also offers various opportunities in the market to meet increasing demand for lighter and greener products. In line with this, Holding's competitive strength will benefit from this as it continues R&D Investments of Circular and Low Emission Product and Process Design.

Since it enables use of competitive and efficiency advantages of digital transformation to support green transition, twin transition is a strategy that support sustainable development of Türkiye. Integrating the digital transformation with the green transition perspective accelerates green transition and combating climate change. In line with this Norm Holding aligns its already existing digital transformation initiatives with green transition efforts. The outcomes of this Twin Transition also support the Company's **Transition to Low Carbon Economy, Resource Management, Sustainability for Suppliers** and **Occupational Health, Safety and Employee Well-being** strategies.

Driven by its matters, Norm Holding aims to create a fair, safe and decent working environment not only in its affiliated companies, but also in its suppliers and its ecosystem. As part of this, **Diversity, Equity and Inclusion** as well as **Occupational Health and Safety** and **Employee Well-being** are main elements of its sustainability strategy.

	Materiality	Macro Themes
Norm Holding Sustainability Strategy 2024-2028	1	Transition to Low Carbon Economy
	2	Resource Management
	3	Occupational Health, Safety and Employee Well-being
	4	Diversity, Equity and Inclusion
	5	Circular Product and Process Design
	6	Twin Transition
	7	Sustainable Supply Chain



SUSTAINABILITY MANAGEMENT



Sustainability Committee, established under the Board of Directors in 2021, is responsible for the implementation of Norm Holding's sustainability strategy. The committee is represented by managers who are experts in their field and understand sustainability issues. Trainings and workshops are held to ensure that the committee and senior management understand the sustainability agenda. In 2023, senior management and members of the Sustainability Committee have received sustainability training.

Committee continues its activities through the working groups within its structure. With 2024 strategy studies working groups have been reorganized. Within this scope **Environment, R&D and Innovation, People and Society** and **Sustainable Supply Chain** working groups have been established. Each working group reports the works under their expertise to the Sustainability Committee regularly and submits recommendations and actions required to efficiently execute the strategies. Duties and responsibilities of the Committee and its working groups are described in the Corporate Governance section of the Report.

In order to ensure the sustainability strategies are executed efficiently and completely, **Sustainability and Management Systems Directorate** that report directly to CEO has been created in 2022. Directorate is responsible for coordinating sustainability efforts, environment and energy management, quality management system, occupational health and safety (OHS) management through different teams reporting to it.

Sustainability Specialist and its team working under the Directorate coordinate execution of sustainability strategies, identifying actions that will achieve the goals and monitoring performance. Coordination of the Sustainability Committee is done by the Sustainability Specialist.

Training and awareness programs are held to increase and expand sustainability awareness throughout the Holding. Each year a Sustainability Workshop is held with participation of Sustainability Committee working groups and sponsors. Two separate events were held in Spring Sustainability Workshop in 2023 with 150 participants. While the first one aimed to extend good practices in Norm Holding and its affiliate companies, the second one assessed practices outside the Holding and their applicability to the Holding has been assessed. From the project preapproved by the Board of Directors, those that require no budget are implemented directly. Projects that require financial resources are added to the budget. Process is managed by business unit directors and monitored and coordinated by Sustainability and Management Systems Directorate.

Within the scope of SDG 17: Partnership for the Goals, Norm Holding establishes partnerships with local and global non-governmental organizations and reinforces its sustainability practices. Actively participating in the activities of UNGC Türkiye, to which it has been a signatory since 2021, Holding issues Communication on Progress (CoP) each year. 2023 report has been shared and submitted to the stakeholders in the relevant statement period.

Within the UNGC, Holding participated in the UNGC **Climate Ambition Accelerator Programme**. This program supports improvement of net zero and transition strategies with global best practices and tools like capacity building sessions, online trainings, stakeholder communication platform where Science Based Targets Initiative (SBTi) methodologies are presented.

Holding will represent Türkiye in **2024 UNGC Leaders' Summit** within the scope of another UNGC program it participates; **SDG Innovation Accelerator for Young Professionals**. Holding also joined **UNGC Target Gender Equality Program** in 2024.

Human Matters Goals



Materiality Topics	Goal	Goal Year	KPI	Progress Status
Occupational Health and Safety (OHS)	Zero work accident	-	Accident severity ratio, % Accident frequency ratio % Occupational disease ratio(ODR) OHS Trainings (per employee – per subcontractor)	2023 Accident Frequency Ratio % 10.05 (Number of accidents x 1,000,000/Total Working hours) Accident Severity Ratio % 0.16 (Loss Days x 1000)/Total Working hours) Occupational Disease Ratio % 0.00 (Number of Occupational Disease x 1,000,000/ working hours) In 2023, a total of 42,654 hours of OHS training were provided, of which 23,152 hours were on-site and 19,502 hours were remote.
Talent management and employee engagement	Increasing the Employee Satisfaction Rate to 90%	2030	Employee satisfaction % Seniority Year	Employee satisfaction score was measured to be 73 in Employee Opinions Survey conducted with participation of 80% of the employees in 2023. Volunteer Action Committees created in accordance with survey results prepared action plans and the implementation and improvement of these plans was initiated.
	Increasing Employee Engagement Rate to 76%	2025	Employee engagement %	Employee engagement score was measured to be 59 in Employee Opinions Survey conducted with participation of 80% of the employees in 2023. Volunteer Action Committees created in accordance with survey results prepared action plans and the implementation and improvement of these plans was initiated.
	Increasing the average training hours per employee	2024	Total and per person training hours	Training hours provided to employees in 2023: 17,999.72 hours of Professional Development, 1,612.24 hours of Personal Development, 42,654.00 hours of Occupational Health and Safety and 37,994.23 hours of other training is provided. Also, 1,661.56 hours of training with environmental content was provided. Training hours per person in 2023 is 19 hours.
Diversity, Equity, and Inclusion Gender Equality	Increase the rate of female employees to 35%, female STEM (science, technology, engineering, management) employees to 50%, female senior managers to 30%, female mid-level managers to 35%, female all management to 33%.	2030	Female employee ratio % Number of new employees Number of employees by working hours Employee turnover ratio % Under 30 years old/30-50 years old/over 50 years old Number of Positions Filled with Internal Candidates Number of all open positions Number of employees Under 30 years old/30-50 years old/over 50 years old, Female/Male, BoD	Female employee ratio in 2023: 9% Female employee ratio in STEM positions: 34% Senior Management (chairperson/director) female employee ratio: 25% Mid- Level Management (factory manager/group manager/manager) female employee ratio: 24%
	Being signatory to Women Empowerment Principles (WEPs)	2025	Compliance to deadline WEPs	In 2024, with the participation of representatives from the Corporate Communications unit, UNGC was included in the Target Gender Equality Program. In this process, it is planned to use the WEP Self Assessment Tool to assess the current situation, identify areas for improvement and prepare an action plan.

Planet Matters Goals



Material Topics	Goal	Goal Year	KPI	Progress Status
Transition to Low Carbon Economy	Net zero emission target- Scope 1 and 2 emissions	2050	Carbon footprint measurements (tons of CO2 equivalent)	Scope 1 and 2 emissions are being reported since 2021. In 2023 scope 1 emissions were 42,850 tons of CO2 equivalent and scope 2 emissions were 48,327 tons of CO2 equivalent. During the reporting period environmental impact has been analyzed. Reporting has started for export products that entered the scope of CBAM which entered into effect on October 1st, 2023.
			Renewable Energy Production Amount (MWh)	2 million Euros of investment has been made in solar power plants (SPPs) in 2023. It is projected that, through investments in SPPs, 40% of electricity consumption will be sourced from solar energy by 2026. In 2023, SPPs produced 4.5 million kWh of energy.
	Reducing carbon footprint emissions by 50% from 2021 - Scope 1 and 2 emissions	2030	Carbon footprint measurements (tons of CO2 equivalent)	Decarbonization roadmap project started in 2022 has been made more extensive with Norm Fasteners Bolts Izmir and Salihli, Norm Fasteners Nuts, Norm Coating and Norm Fasteners Screws companies in 2023. Decarbonization efforts will continue in 2024.
	Increasing renewable energy production by 50% from 2021	2030	Renewable Energy Production Amount (MWh)	Investment in hybrid and/or electric models are prioritized to reduce the use of fossil fuels. Renewable energy production capacity, which was 3.9 MW with SPPs has been raised to 6.9 MW in 2023. Renewable energy from Izmir and Salihli continues to increase for the last three years in a row.
	Energy efficiency to double by 2020	2030	Energy efficiency %	Within the scope of energy efficiency projects in 2023: Floating Ball Project aims 50% energy savings and 80% reduction in heat loss in Norm Fasteners Nuts factory. With the change in the design of drum, Norm Coating achieved 19% electricity saving per product. The transition to IE3 efficient motors in sandblasting machines is expected to result in an annual electricity savings of at least 15%. With the Light Tubes Project energy consumption for lighting has been eliminated and 1,460 kg CO2 emission has been prevented. Natural gas consumption in winter has been reduced by 15% with use of waste heat in Lamella Coating processes. Norm Coating and Norm Fasteners Nuts switched to LED fixtures. Fluorescent lamps have been replaced with motion sensor lights in offices. At Norm Fasteners Bolts Izmir facility, insulation projects for 4 furnaces have been planned, with an anticipated energy savings of 8%. Implementation is scheduled to begin in 2024.
Resource Efficiency	Reducing energy consumption per production by 33% from 2021	2030	Energy Density (MWh/ton production)	Since 2021, energy intensity measurements have been conducted. In 2023 energy density was 2.00 MWh/ton production for Norm Fasteners Bolts, 2.16 MWh/ ton production of Norm Fasteners Screws, 1.74 MWh/ ton production for Norm Fasteners Salihli, 1.13 MWh/ ton production for Norm Fasteners Nuts and 0.62 MWh/ ton production for Norm Coating.
	Zero Waste target- (hazardous and non-hazardous waste)	2050	Amount of Hazardous Waste (kg) Amount of Non-Hazardous Waste (kg)	Norm Fasteners and Norm Coating Izmir and Salihli facilities have Zero Waste certification and employees receive training on waste management. In 2023, 19,297.21 tons of non-hazardous waste and 3,299.18 tons of hazardous waste were generated.
	Reducing amount of water drawn in the production facilities by 30% compared to 2020	2030	Water Intensity (m3/ton production)	In 2023, water density was 1.32 in Norm Fasteners Bolts, 2.21 in Norm Fasteners Screws, 1.46 in Norm Fasteners Salihli, 2.69 in Norm Fasteners Nuts and 5.37 in Norm Coating.

Technology Matters Goals



Material Topics	Goal	Goal Year	KPI	Progress Status
Twin Transition	Increasing Digital Maturity Level index	2025	Digital Maturity Level Measurement	In 2022, the Digital Maturity Level was 54.76, and by 2023, it increased to 55.95, mainly due to efforts in digitalizing sales and planning processes.
	Increasing RPA process automations	2025	Number of processes transferred to Normie (number of units)	In 2022, a total of 72 processes were transferred to Normie, resulting in an additional 6,500 hours of workforce. In 2023, the number of processes increased to 208, providing an additional 12,600 hours of workforce per month.
R&D and Innovation Circular Product and Process Design	Increasing R&D spending to 2%	2030	Ratio of R&D spending to turnover, %	In 2023, the ratio of R&D spending to revenue was 3.85% at the Norm Tooling facility, 1.45% at Norm Fasteners Bolts, and 0.296% at Norm Fasteners Nuts.
	Increasing number of copyrights and patents	2030	Number of copyrights and patents	In 2023, Norm Holding submitted 9 new patent applications, bringing the total number of applications to 40, of which 23 have been approved.
	Increasing R&D center project numbers	2030	Number of R&D center projects	In 2023, the R&D center conducted projects aimed at extending product lifespan, increasing material efficiency, reducing waste, and optimizing energy consumption. A total of 9 million Euros was spent on digitalization and R&D investments, resulting in the completion of 23 projects and 8 theses in collaboration with universities.



Work Matters Goals



Material Topics	Goal	Goal Year	KPI	Progress Status
Product quality and safety	50% reduction in emissions from input products	2030	Recycled material use ratio, % Green steel use ratio, % 100% compliance with the Conflict Minerals Policy among critical suppliers.	In 2023, 67% of the iron and steel raw materials were produced with the EAF method.
	Establishing a Supplier Development Program	2024	Number of high-risk suppliers Percentage of buyers trained in sustainable supply	In the 2023 ESG assessment, 40% of suppliers in the industrial sector and 50% in the trade sector were identified as medium to high risk. Starting in 2024, supplier development will focus on providing training on ESG topics to those identified as high risk. This initiative will be included in the relevant teams' OKRs.
	Evaluating Supplier Sustainability (ESG) Performance	2023	Ratio of suppliers included in the assessment, %	Norm Holding Supplier Handbook has been updated in 2023 and Sustainability Score has been added to overall score. To determine sustainability score, ESG surveys were applied to 17 industry group and 10 trade group suppliers by prioritizing by purchased amounts, relevant evidence documents have been inspected. Upon this assessment, a Sustainability score was created and assessments will continue by extending the scope.
Customer expectations and satisfaction	Increasing Customer Satisfaction Rate to 4.05 out of 5	2023	Customer satisfaction %, Potential customer portfolio, Number of customer assessments completed, scores	According to the 2023 survey results, Norm Holding's customer satisfaction is 4.30 (90%) for domestic customers, 3.75 (78%) for international customers, and the overall satisfaction score is 4.09 (86%). Considering that the target for 2023 was 4.05, the results show that Norm Holding not only achieved the target but also exceeded it.
Responsible Investment approach	Making ESG assessment during investment	2024	Savings and Decreases Obtained with Environmental Investments	In 2024, contribution to green transition criterion was added to investment budgets.
	Creating Responsible Purchasing Policy	2023		In 2023,the Responsible Purchasing Policy was created and published on the Norm Holding website. Starting in 2024 number of suppliers that sign the policy will be observed as a KPI.
Corporate governance	Preparing a compliance report with Corporate Governance Principles	2025	Compliance with deadline	In 2023 Corporate Governance Principles Compliance Report has been completed. It is accessible on Norm Holding website. Norm Holding received 9.19 score over 10 in Corporate Governance Principles Compliance assessment in 2023.
	Developing ethical advice and reporting mechanisms	2023	Ethics training hours Number of ethical concerns reported	In 2023, a total of 2,055 individuals received ethics training at Norm Holding and its affiliated companies.

We are committed to fostering an **inclusive** environment across our value chain that values **diversity**, promotes **gender** equality, and enables everyone to leverage their skills and potential to the fullest.



**HUMAN
MATTERS**

HUMAN MATTERS

Norm Holding operates with a Human Matters approach, observing its responsibilities towards all its stakeholders, employees and society. In determining its business strategies, Norm Holding gives priority to the well-being, professional development and social benefit of its employees.

Main priorities of Human Matters approach

- Establishing a value chain that respects human rights, is fair, non-discriminatory, equitable and respects human dignity
- Implementing high standards of occupational health and safety.
- Creating a workplace environment that is diversity, equity, and inclusion.
- Ensuring gender equality
- Supporting the training and development of skills that enable adaptation to technological developments in the ecosystem
- Promoting access to the arts for all levels of society.

The Holding's **Human Rights Policy** outlines its commitments to employees and society, along with its guiding principles. The Holding supports human rights throughout its value chain and fully complies with global standards as well as legal regulations in the countries where it operates . It fosters a fair, safe and healthy work environment, striving to create a non-discriminatory, egalitarian and humane work environment. It exercises due diligence to identify and prevent human rights risks and is committed to making fair improvements in the event of negative impact.

DIVERSITY, EQUITY AND INCLUSION

In line with legal requirements, the Holding carefully protects the rights of its employees and business partners. As a signatory to the UN Global Compact (UNGC), it does not tolerate discrimination based on personal characteristics such as age, gender, religion, language, race, ethnicity or sexual orientation. The company is committed to the principles of diversity, equity and inclusion and ensures equal opportunities for its employees in recruitment, career development, performance evaluation, promotion, training and compensation.

Within the framework of the **Code of Conduct** and the Human Rights Policy, Norm Holding and its affiliated companies have a zero-tolerance approach to discrimination and harassment. Disciplinary mechanisms and legal procedures are implemented in cases of discrimination or harassment. Training programs are organized to raise employee awareness of issues related to discrimination and harassment.

Diversity, equity, and inclusion awareness programs have been developed within the Holding. In 2023, a training session on Gender Equality in the Workplace covered topics such as the definition of gender, gender-based stereotypes, sexual identity, and sexual orientation. The training also emphasized the benefits of overcoming stereotypes. A total of 413 participants attended the training.

Female employees who took parental leave	2021	2022	2023
Employees entitled to parental leave	15	10	9
Employees who took parental leave	15	10	9
Employees who returned to work after the end of parental leave	15	10	9
Employees who returned to work after parental leave and worked for at least 12 months afterwards	14	7	8

In order to improve the quality of life for employees and create a more inclusive working environment, Norm Holding and its affiliated companies have introduced an additional 10 days of fathers paternal leave from 2022, in addition to the legal paternal leave.

Males employees who took parental leave	2021	2022	2023
Employees entitled to parental leave	196	234	215
Employees who took parental leave	196	234	215
Employees who returned to work after the end of parental leave	196	234	215
Employees who returned to work after parental leave and worked for at least 12 months afterwards	166	181	166

In 2023, 8 out of 9 female employees entitled to parental leave returned to work and worked for at least 12 months, while 166 out of 215 male employees also returned to work after parental leave and worked for at least 12 months.

Gender Equality

Norm Holding is committed to increasing the percentage of female employees each year. By 2030, the Holding taims to achieve 50% of women in STEM positions, 30% in senior management, 35% in mid-level management and 33% in all management positions.

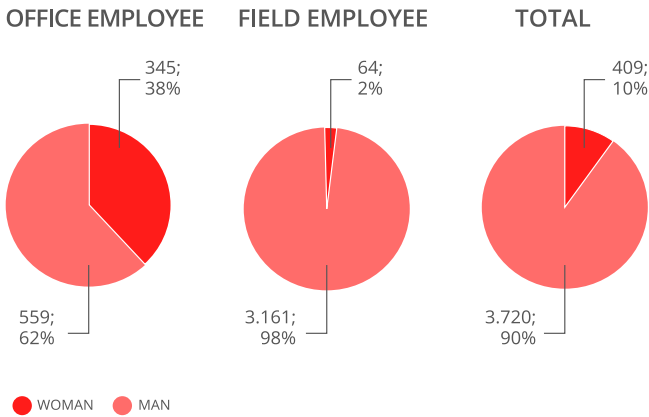
Norm Holding continues to increase the percentage of female employees each year and aims to sign the UN Women Empowerment Principles (WEPs) by 2025. In line with this goal, the Corporate Communications department has joined the UN Global Compact's Target Gender Equality Program in 2024.

As part of this program, the WEP Self-Assessment Tool is used to assess the current situation, identify areas for improvement and develop action plans.

Employees by Gender	Unit	2021	2022	2023
Male	Person	3062	3488	3720
	Ratio	91,5%	91,0%	90,1%
Female	Person	283	343	409
	Ratio	7,8%	8,2%	9,0%
TOTAL		3345	3831	4129

These actions will support the achievement of the goal of being a WEPs signatory by 2025.

To support the career development of female, mentoring programs, leadership training and opportunities to take on responsibility in projects are offered. In 2023, 50 female students were included in young talent programs and offered internship opportunities.



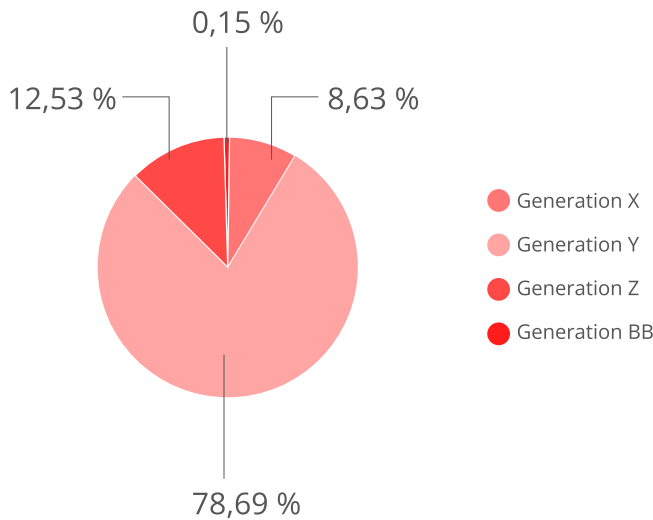
Workforce in Management

By Management Category	Unit	2021	2022	2023
Senior Management*	Female	4	4	5
	Ratio	25,0%	23,5%	23,8%
	Male	12	13	16
	Ratio	75,0%	76,5%	76,2%
Mid-Level**	Female	15	16	13
	Ratio	22,4%	22,9%	18,8%
	Male	52	54	56
	Ratio	77,6%	77,1%	81,2%
Other***	Female	19	24	24
	Ratio	23,5%	28,6%	28,2%
	Male	62	60	61
	Ratio	76,5%	71,4%	71,8%
TOTAL		164	171	175

* Senior Management: Chairperson, Director. **Middle Level: Factory Manager, Group Manager, Manager. *** Other: Manager

Youth Employment

In 2023, 49% of new hires will fall into the youth employment category. Norm Holding aims to build a dynamic and innovative workforce by integrating young talent into the organization. The company supports the professional development of young people through internship programs, mentoring opportunities and various training initiatives, and accompanies them on their career paths.



Employment Data by Age	Unit	2021	2022	2023
18-30 years old	Female	98	133	178
	Ratio	6,1%	7,1%	8,9%
	Male	1498	1743	1831
	Ratio	93,9%	92,9%	91,1%
31-40 years old	Female	129	145	163
	Ratio	10,7%	10,8%	10,9%
	Male	1072	1195	1330
	Ratio	89,3%	89,2%	89,1%
41-50 years old	Female	47	52	54
	Ratio	10,2%	10,2%	10,3%
	Male	415	460	468
	Ratio	89,8%	89,8%	89,7%
51-60 years old	Female	7	9	10
	Ratio	12,3%	11,8%	13,5%
	Male	50	67	64
	Ratio	87,7%	88,2%	86,5%
Over 60 years old	Female	0	0	0
	Ratio	0,0%	0,0%	0,0%
	Male	4	4	4
	Ratio	100,0%	100,0%	100,0%
TOTAL		3320	3808	4102

Disability Employment

Norm Holding aims to enhance the potential of employees with disabilities by supporting their equal participation in the workforce through accessible work environments and specialized programs. As of 2023, the total number of employees with disabilities is 96.

Workforce		2021	2022	2023
Disabled	Female	10	14	14
	Male	56	75	82
Total		66	89	96

EMPLOYEE SATISFACTION

Norm Holding considers people to be its most important value in achieving strategic goals. To enhance the employee experience, an Employee Opinion Survey (EOS) is conducted every two years in collaboration with independent research firms.

In 2023, the survey, with an 80% participation rate, assessed factors such as engagement, agility, talent focus, leadership, and satisfaction. The results indicated an employee engagement score of 59 and an employee satisfaction score of 73. Norm Holding aims to increase employee satisfaction to 90% by 2030 and employee engagement to 76% by 2025.

Employee Loyalty and Satisfaction Score	Unit	2021	2023
Employee Loyalty	Points	71	59
Employee Satisfaction	Points	82	73

The analysis and reporting of survey results, along with the creation of action plans through focus group discussions, are managed by the Human Resources department. As part of these processes, Action Committees are formed to develop proposals for action. The recommendations prepared are submitted to the Board of Directors by Human Resources. Approved recommendations are implemented by the relevant business units under the coordination of Human Resources.

In 2021, 97% of the actions from the Employee Opinion Survey (EOS) were completed. Based on the results from the 2023 EOS, improvement efforts have begun with the goal of increasing employee engagement and satisfaction.

Between Us Meetings

To improve direct communication with employees, the Holding and its affiliated companies hold regular **“Between Us Meeting”** meetings each year. These meetings bring together employees and the Holding’s managers to share information about the company’s strategies, goals and performance, and to gather employees’ wishes and suggestions.

In 2023, a total of 10 online and 35 on-site “One-on-one meetings” meetings were held.

TALENT MANAGEMENT

Norm Holding believes that fair, equity and inclusion in talent management, which enables employees to realise their potential, is the foundation for sustainable success. The motto of the Holding’s Human Resources department is The Talent Management process is managed by the Talent Development Unit within the Human Resources Directorate.

Seninle birliKte (Together With You)

Norm Holding aims to create a team that:

- Makes a difference to the customer,
- Believe in the power of the team,
- Prioritizes diversity, equity and inclusion through a fair and respectful approach,
- Designs its business model to add value to society and the environment and,
- Supports continuous improvement.

This process is designed to ensure the continuity of leadership knowledge, preserve and enhance the organization’s expertise and experience, anticipate future needs, and maintain a workforce ready to fill key positions. To create a sustainable organizational structure, candidates are identified for all management roles, and these individuals are prepared for their future positions. Additionally, all employees are evaluated objectively based on established promotion criteria, and the process is conducted transparently.

Throughout the year, talented employees are placed in the Performance-Potential Matrix based on their performance. This matrix evaluates employees’ current performance and future potential.

The effective and efficient operation of the Career Management processes is the responsibility of the Organizational Development Unit. Career Planning and Promotion processes are conducted in March and August each year. Candidate assessments for management positions are carried out, and short-, medium-, and long-term lists are reviewed annually. This practice aims to define employees' career paths and sustainably enhance the organization's leadership capacity.

Internal rotations and career opportunities are communicated to employees through the internal announcement system "Steer Your Career". In 2023, 32 internal advertisements were published and 36 office employees were offered rotation opportunities within the company.

With the launch of the WTW Organizational Effectiveness and Career Architecture Project in 2023, the goal is to modernize human resources systems and enhance organizational effectiveness. As part of the project, career management and promotion systems have been updated in alignment with company strategies. Technical competencies have been defined for all positions within the career architecture framework. A total of 19 meetings were held, involving discussions with 91 managers. The ongoing project aims to track workforce data, and its outcomes will encompass all white-collar employees.

Recruitment Processes

The Holding's recruitment and employment processes are outlined in the Human Resources Policy under the section on Diversity and Equal Recruitment Opportunities and are based on the following values and principles.

- **Equal Opportunity:** Candidates are evaluated with equal opportunities, independent of factors such as language, race, gender, or sexual orientation.
- **Objective Assessment:** An objective process is followed that aligns with the requirements of the position.
- **Zero Tolerance for Discrimination:** A zero-tolerance policy for discrimination is enforced throughout all processes.
- **Competency Focus:** Recruitment is based on candidates' competencies and experiences.
- **Transparency:** The process is conducted transparently and fairly, with feedback provided to candidates.
- **Confidentiality:** Candidates' personal information is protected, and privacy is respected.

To modernize the recruitment processes, a new generation recruitment framework designed in 2022 was enhanced in 2023 with new tools and integrations.

Developed by Norm Digital, the artificial intelligence (AI) based recruitment platform "Vinter" creates a streamlined and transparent process between candidates and human resources departments, increasing efficiency. It also prioritizes the candidate experience by supporting the objective assessment of skills and ensuring the right candidate is placed in the right role. Candidate feedback helps improve the effectiveness of the recruitment process and supports ongoing development goals.



Performance Management

Norm Holding systematically implements performance management for both white-collar and blue-collar employees in order to ensure the continuity of the company's success. This process is carried out within the framework of the Performance Management Procedure prepared by the Human Resources Directorate and approved by the CEO. Employees' work objectives are aligned with the strategic objectives of the Holding and its affiliated companies and are regularly evaluated through the Performance Management System (PMS).

Since 2021, objectives for employees within the Performance Management System (PMS) have been set using the Objectives and Key Results (OKR) methodology and are monitored using Specific, Measurable, Achievable, Relevant and Time-bound (S.M.A.R.T.) criteria. Starting in 2024, sustainability metrics and performance targets will also be included in the scorecards of business unit heads and relevant managers.

To ensure that all employees are aligned with the strategies and goals of the Holding and its affiliated companies, OKR Coaches provide training and contribute to the performance review process.

As part of the performance review process, employees have one-on-one meetings with their managers three times a year. The performance review process begins at the end of the year, with improvement plans implemented for underperforming employees.

Performance evaluations for blue-collar employees are based on both team and individual objectives. These are set by the relevant business unit managers, method teams and Human Resources. The goals are transferred to the PMS platform and during the year-end review period the status of individual and team goals is measured by the method teams and Human Resources. Field Leaders conduct the assessments under managerial supervision, and the process is completed upon managerial approval. The results of this process are linked to talent management. In 2023, the performance evaluation processes for field employees were transferred to the performance platform developed by Norm Digital.

Remuneration

In line with long-term strategic goals, sustainable growth and ethical values, a fair and competitive remuneration policy is implemented based on market analysis. Wages are determined in accordance with legal obligations, taking into account macro-economic data, industry policy, company size and position-related job sizes.

The remuneration policy provides an equal income package for all employees without discrimination, offering fair wages and comprehensive benefits in line with industry standards and the local labor market. Employee representatives contribute to the implementation of a fair and transparent remuneration policy by expressing employee views on benefits and other elements of remuneration.

Remuneration and Nomination Committee under the Board of Directors manage determination, selection and recommendation of senior level and administrative positions. This process aims to win talented managers to the company and increase motivation of current managers with a fair, transparent and competitive remuneration policy.

Development Activities

Training and development processes are managed by the Talent Development Unit under the Human Resources Directorate. Employees are supported through technical training and competency programs to enhance their skills and competencies. Training needs are identified in line with unit managers, legal processes, career planning and development plans. The Holding's Human Resources Department consolidates these needs and creates annual training plans and budget.

The Holding implements a comprehensive strategy to identify and meet the current and future skills and competence needs of its employees. Employee training and development programs take place under the **N'Academy**, which was launched in 2018. N'Academy prepares employees for the new and technological advances, offering both technical and mandatory training, as well as programs aligned with global trends. Leadership development and coaching programs are run to raise future leaders. There are internship and apprenticeship programs to increase youth employment and meet labor needs of the industry.

The Norm Online Development Platform, launched in 2023, provides comprehensive training in leadership, competencies, talent development, digitalization and technical fields, in addition to mandatory training. The platform enables employees to continuously improve themselves and acquire skills in line with the company's needs, fostering a culture of continuous learning and development.

All Trainings (By Type) /Hour*Person	2021	2022	2023
Professional Development	14.111	18.671	17.999
Personal Development	2.315	84	1.612
OHS	25.343	32.604	42.654
Other	30.115	28.944	37.994
Total Training Hours	71.883	80.303	100.206

Environment Related Trainings		2021	2022	2023
Trainings	Hour*person	1.008,00	1.497,00	1.661,56
Trained employees	Person	699	883	1.263

DEVELOPMENT PROGRAMS AND TRAINING

N'Academy

En Lider Sensin

Started in 2020, “ENLider Sensin” Leadership Development Program aims to improve leadership skills of managers with a hybrid education model. Program offers an enriched development experience with one on one and group coaching, digital learning programs, 360-degree reports and feedback interviews in addition to in-class education. Its contents are updated each year in line with corporate strategies and goals.

Program has been awarded silver award in **Best Leadership Development Programs** category in 2022 by **Brandon Hall Group**.

In 2023 1,196 hours of training was provided under “ENLider Sensin” Leadership Development Program.

ReNorm Reverse Mentorship Program

Providing a model contrary to one-on-one mentorship programs, ReNorm Reverse Mentorship Program aims to increase interaction between generations. In this program young employees are prescribed to mentor experienced employees. Young mentors share their contemporary experiences with former generations of leaders transferring the perspective of the world and the job from the young generations' perspective. This interaction strengthens communication in the organization and contributes to the development of both young and experienced employees.

Along with the young employees of the Holding Yetgen platform students have also been included in the program.



Power of the Field, Power of Norm

The project, which has been ongoing since 2018, aims to enhance leadership competencies by providing training on team management, communication, and relationship management to site and team leader candidates.

Professional and Technical Trainings

To ensure that employees gain high-level competencies in their respective fields, professional and technical training is prioritized. These trainings are regularly offered in various areas, enabling employees to perform their tasks more efficiently and effectively.

Sustainability Trainings

Precursor to implement the sustainability strategy of the Holding is to raise the awareness of the employees. In line with this, in 2023, 23,716 hours of sustainability training have been provided. Trainings cover important topics such as the sustainability concept, **carbon footprint, Green Deal and CBAM, ethics and gender equality** at workplace.

Development of Digital Competence and Revolutio'N Project Training

The **Revolutio'N Project**, which was launched in 2022 with the aim of promoting digital competencies, equipping employees with the skills needed for the future and supporting innovation, first provided “Basic and Advanced Power BI Training Sessions”. In 2023, RPA training was added to the project.

Master's & Doctorate & Certificate Programs & Foreign Language Education

To enhance the contribution of individual development to the organization, employees are supported in their master's, PhD, and professional certification education. Additionally, programs that promote foreign language development are provided.

YOUNG TALENT ACQUISITION PROGRAMS

To help young talents discover their potential, develop their skills, and set their career goals, development programs have been implemented for university and high school students.

Rise N Grow New Graduate Program

Launched in 2023, this 6-month program aims to integrate newly graduated young talents into the organization and develop their leadership potential. Participants gain work experience while being supported with project work, mentorship, and various training programs. As of 2023, 8 young talents have joined the program.

N'Talent Program

N'Talent is a part time working model open to university and graduate students starting from second year. Program enables young talents to apply their theoretical knowledge and improve their skill in the business world. While participants work part-time 2 to 4 days of the week, they prepare projects in guidance of a mentor and attend online/in-class development programs.

In 2023, 34 young talents participated **N'Talent Program** and 14 youth successfully completing the program were included in the Norm Holding team.

DigiConnect Online Development Program

The program, which offers students online learning and development opportunities, has been organized in the summer and winter terms since 2020. In 2023, 18 students attended the program. Young talents that completed the program have priority in new graduate programs and open positions within Norm Holding.

DigiConnect

SAP Academy

Founded in 2022, SAP Academy offers young professionals an opportunity to make a strong start in their career. Within the program, NORM Digital SAP Module Consultancy departments provide theoretical, applied and personal development trainings for 9 months. Process is supported with real life work experience and mentorship.

In the first year of the program, 7 recent graduates joined. In 2023, 12 new professionals were added to the program.

SAP Academy has been granted Silver Awards in TECEP Start/Orientation category in 2022.



Norm Internship Program

Norm Internship Program offers summer internship and long term internship opportunities to vocational high school, university 3rd and 4th grade and masters' degree students. Interns successfully completing the program have priority in new graduate programs and open positions.

In 2023 28 vocational high schools students and 76 university students attended the program.

OCCUPATIONAL HEALTH AND SAFETY

Occupational Accidents	2021	2022	2023
AFR – Accident Frequency Rate** (Number of Accidents x 1,000,000 /Total Working Hours)	16,50	10,70	10,05
Accident Severity Rate** Days Lost x 1000 /Total Working Hours	0,24	0,21	0,16
Occupational disease rate (ODR)** Number of Occupational Disease x 1,000,000/Working Hours	0,00	0,00	0,00

** Norm Holding consolidated occupational health and safety data covers data from Norm Fasteners Bolts, Norm Fasteners Vida, Norm Fasteners Nuts, Norm Coating, Norm Tooling, Norm Forging, NRM Engineering, STD companies*
*** (ILO International Labor Organization) Methodology has been used.*

Norm Holding addresses occupational health and safety (OHS) with an approach that prioritizes the health and safety of employees and all stakeholders, going beyond legal requirements. In 2022, to increase coordination and collaboration between companies, OHS activities were centralized under the Directorate of Sustainability and Management Systems. As of 2024, OHS efforts in the factories are conducted under OHS specialist under business unit directors. Central operations and issues that need uniformity are coordinated by the Management Systems Manager and OHS specialist.

Holding attaches importance to ISO 45001 Occupational Health and Safety Management System certification processes. The certification renewal has been completed for Norm Fasteners Bolts Izmir and Norm Coating Izmir facilities, while the certification processes for Norm Fasteners Nuts İzmir, Norm Fasteners Nuts Salihli, Norm Fasteners Bolts Salihli, and Norm Fasteners Screws have been completed. The certification of the Holding's other companies will be completed in 2024.



OHS risks are managed within the framework of the Hazard-Based Risk Assessment Procedure established in 2023 as part of the Integrated Management System. Occupational accidents are analyzed in detail and most frequent accidents and their root causes are identified and extensive actions are implemented to reduce the frequency and severity in line with the obtained data. Cross-factory visits, organized with the participation of occupational safety experts and responsible personnel, are systematically conducted to spread best practices across our companies and to comprehensively analyze risks in the fields. Based on the data obtained from cross-factory visits, high-risk and priority issues are identified, and action plans are developed for these areas. This ensures that necessary measures are swiftly taken, thereby improving occupational health and safety standards.

QDMS Incident Notification Module has been implemented for tracking occupational accidents and actions required to prevent them from repeating, active notification of Near Miss and Dangerous Occurrences by the employees. In 2023, 761 records have been created and 71% has been closed after taking necessary actions.

Periodic controls are made for safer use of machinery and equipment in the factory and storage areas and improvement actions are identified and systematically tracked. In 2023 total of 2,330 machine and equipment has undergone periodic control and 92% of non-compliances found are rectified.

The OHS committee meetings are held in accordance with legal deadlines, considering the hazard classes of Norm Holding and its affiliated companies. Regularly held OHS committee meetings ensure consistency in OHS strategies and practices. In 2023, 395 decisions made in these meetings were implemented successfully, with 73% of them closed. Emergency plans are prepared based on factors such as the geographical conditions of the region, production methods, and the number of employees at Norm Holding and its affiliated companies. In 2023, a total of 1,490 hours of training were provided to emergency response teams, and 25 emergency drills were conducted.

Regular inspections are conducted, and healthcare services are provided. A doctor, first aid personnel, fire prevention staff, and OHS officers are assigned to each factory.



Internal audits on OHS are done by central OHS department in two stages with controls of documents demanded by Ministry of Labor and Social Security and field arrangements control. Non-compliances found are monitored through QDMS system.

In addition to the trainings required by legal regulations, the Holding implements comprehensive programs to maintain, promote, and develop the OHS culture. Regularly, basic OHS, emergency management, instructions, and single-point training sessions are conducted. In 2023, a total of 42,654 hours of OHS training were provided, with 23,152 hours face-to-face and 19,502 hours online.

Occupational Health and Safety Trainings	2021	2022	2023
Number of employees	3284	3758	4053
Number of subcontractor employees	149	187	176
Number of total participants	3284	3758	4053
Total OHS Trainings (person*hours)	23,343	32,604	42,654

**Norm Holding consolidated OHS trainings includes Norm Holding, Norm Fasteners Screws, Norm Tooling, Norm Fasteners Bursa, Norm Fasteners Bolts Izmir, Norm Fasteners Bolts Salihli, Norm Digital, Norm Additive, Norm İç Diş Tic., Norm Forging, Norm Fasteners Nuts, NRM Engineering, STD, Norm Coating companies.*

SOCIAL CONTRIBUTION

Holding aims to increase added value it creates and support socioeconomic development through social projects in the regions it operates. n determining its social investment strategies, the Holding focuses on common issues in Turkey and around the world, in alignment with its values. It develops projects to enable quality education, access to culture and arts by all society and to build a brighter future.

Support and Assistance in the Regions Affected by the February 6 Earthquake

The earthquake centered in Kahramanmaraş on February 6th, 2023, were one of the greatest disasters in Türkiye, affecting many cities and deeply shaking the entire nation.

Norm Holding made donations through respected non-governmental organizations of Türkiye such as AÇEV and Darüşşafaka to mitigate the ruin the earthquake caused and to contribute to the long term improvement process of the region and organized various in-kind aid campaigns with contribution of all its employees.

Container house project aiming to enable local people to continue living, held under the leadership of Ford Otosan, was supported.



Support for Quality Education

Private Izmir Atatürk OSB Nedim Uysal Vocational and Technical Anatolian High School

Founded in Izmir Atatürk Organized Industrial Zone (IAOSB) Management in 2014, **Private IAOSB Nedim Uysal Vocational and Technical Anatolian High School**, bears the name of Norm Holding Founder and Board of Directors Honorary Chairman Nedim Uysal.

The school, established to train skilled and qualified engineering candidates in fields such as industrial automation, electrical-electronics, and mechanical technologies, offers education to full scholarship students in technology-equipped workshops and laboratories, as well as in 24-seat fully equipped classrooms.



Norm Vocational Training Center

In order to raise qualified workforce for the industry and provide youth with professional skills, Norm Vocational Training Centers have been founded in Izmir in 2007 and Salihli in 2025.

To date, total of 186 students graduated from these centers. **99 of the graduates are still employed in Norm Holding.** In the centers that teach 178 students in 2023, student development is closely monitored. The target for 2024 is to increase this number to 200. In addition to the current curriculum, students increase their capabilities by taking additional courses in technical and personal development with Apprentice Development Program.



Apprentice Development Program

Norm Holding implemented an extensive development program since 2022, to support apprentice training.

While personal development trainings, technical trainings, seminars, project works and technical visits are organized for apprentice students, personal development trainings and technical visits are also organized for the teachers. Apprentice students' families and teachers are added to this program to establish a collective development process. Additionally, through awareness seminars and parent meetings, collaboration with the students' families are strengthened.

Art for Everyone

Founded in 2003 in IAOSB to support the development of arts and supporting artists, Norm Art supports plastic arts, music and modern dance. Organization aims to make art accessible for all segments of the society, while supporting the artists.

Hosting over 150 exhibitions since its foundation, Norm Art offers extensive art education programs for adults in design, oil paint, acrylic paint and printmaking.



2023 Activities

From May 5 to 16, 2023, in collaboration with the Mavi Kelebek Culture and Art Association, the **Smyrna Mosaic Exhibition**, featuring a diverse collection of works by various artists, was presented to art enthusiasts. This exhibition served as an important platform for promoting artistic diversity.



The exhibition featuring **works by Norm Art's 2022-2023 course participants** was open for visitors throughout June 2023.

In the **100th Anniversary of the Republic Reception** held in Historical Coal Gas Factory in October 2023, hosted Cellist Jamal Aliyev and Ece Dağıstan supported by Norm Art.



30th Izmir European Jazz Festival



Norm Holding is among the supporters of 30th Izmir European Jazz Festival held in Izmir Ahmet Adnan Saygun Art Center between September 14-27, 2023. The Festival staged Feminine **Modern Dance Project**, in which Norm Holding Board of Directors Member and Sustainability Committee Chairperson Duygu Uysal Simrooğlu was the General Artistic Director.

We invest to reduce our environmental impact and **contribute to ecosystem preservation.**



**PLANET
MATTERS**

PLANET MATTERS

Norm Holding develop strategies and creates projects to minimize its environmental impact and to contribute the protection of the ecosystem. Under the approach of **Planet Matters**, Holding focuses its environment management on:

- Transition to low carbon economy
- Efficient use of resources
- Circular product and process design and innovation
- Twin transition

Holding invested **4.17 million Euros** in 2022 and **4.2 million Euros** in 2023 to reduce greenhouse gas emissions and its environmental impact. Environment and energy management is executed with 12 employees under Sustainability and Management Systems Directorate together with sustainability, OHS and quality management systems (QMS).

Under the title Environment in **Integrated Management System Policy** and **Ethical Working Rules** documents, Holding principles and rules on water and waste management, circularity, chemical and hazardous waste management, legal compliance and efficient use of resources are identified.

Holding continuously monitors and improves its environmental impact in accordance with ISO 14001 Environment Management System standard. Within this scope, threat-opportunity and environment scope analyses and internal audits are done.

Findings of the analyses and inspections are tracked on QDMS. In 2023 529 actions are opened on QDMS. 57 of these come from threat opportunity analysis, 26 from environmental scope analysis and 446 from inspection-audit findings. By the end of 2023 68.8% of these actions are closed.

No fines were faced for violation of environmental regulations.



ENERGY MANAGEMENT AND GREENHOUSE GAS EMISSIONS

Holding established its energy management in parallel with ISO 50001 Energy Management System certificate requirements. By legal obligation, ISO 50001 systems are installed in factories that have energy consumption exceeding 1000 TOE (ton of oil equivalent) and have energy managers. Currently 5 Holding company has

ISO 50001 certificate. In 2024, 2 more companies (Norm Tooling and Norm Coating Salihli-2) are expected to complete certification process.

In accordance with legal regulations energy data shall be prepared by persons having energy administrator certificate. With the trainings completed in 2023 within the scope of preparation to regulation, total certified energy managers increased to 11.

Energy Consumption Data

Energy Consumption Data		Unit	2021	2022	2023
Direct Energy	Gasoline	liter	6,886	76,988	170,342
	Diesel	liter	377,720	297,958	377,720
	Natural Gas	m3	18,542,355	18,401,118	18,814,351
Indirect Energy	Electricity from Grid	kWh	97,456,604	108,620,043	120,323,140
	Renewable Energy Production (SPP)	kWh	1,767,189	3,105,442	4,557,529



Energy Density Data

Energy Intensity (MWh/ton production)	2021	2022	2023
Norm Fasteners Bolts	1.97	2.14	2.00
Norm Fasteners Screws	1.86	2.06	2.16
Norm Fasteners Salihli	1.82	1.63	1.74
Norm Fasteners Nuts	1.21	1.18	1.13
Norm Coating	0.56	0.58	0.62

Transition to Low Carbon Economy and Combating Climate Change

Greenhouse gas emissions are calculated and reported in accordance with ISO 14064-1. Carbon emission calculations are coordinated by Sustainability Team. Since 2021 scope 1 and 2 emissions are being reported. Additionally, on October 1, 2023, a pilot practice began to report export products that under CBAM scope. Within this scope supplier company emissions have been collected. In reporting under the CBAM scope, supplier data will be utilized to enable more precise reporting.

Greenhouse Gas Emissions	Unit	2021	2022	2023
Scope 1 Emissions	tons CO2e	37,878.08	38,447.05	43,557.21
Scope 2 Emissions	tons CO2e	41,272.56	47,349.33	48,327.18

**Best Kale and Norm Fasteners Golcuk, which were not included in 2022 calculations have been included in 2023 emission reporting.*

Carbon Intensity (Scope 1 & 2) tons CO2e/ton production	2021	2022	2023
Norm Fasteners Bolts Izmir	0.47	0.52	0.55
Norm Fasteners Salihli	0.44	0.42	0.44
Norm Fasteners Screws	0.53	0.61	0.55
Norm Fasteners Nuts	0.32	0.32	0.31
Norm Coating	0.19	0.20	0.18

Within the scope of combating climate change, Holding undertakes to

- **Reduce scope 1 and scope 2 emissions by 50% by 2030**
- **Increase renewable energy production by 50% by 2030**
- **Achieve “net zero” emission in 2050 in line with the goals of the Paris Agreement on Climate Change**

Improving its energy management strategies continually in line with the decarbonization goals, Holding focuses on energy efficiency, electrification, increasing share of renewable energy sources in total consumption and low carbon emission product and process design. In line with this Holding initiated decarbonization efforts in 2022.



Transition to Renewable Energy

With its SPP investments, launched in 2021 and continued in 2023 with 2 million Euros budget, Holding has installed SPPsE in its 6 companies. Renewable energy production capacity with SPPs was raised from 3.9 MW in 2022 to 6.9 MW in 2023. By the end of 2024, capacity of roof-style SPP projects will be 7 MW, unlicensed field type SPP projects will be 29.5 MW. As a result of these projects the remaining installed power need will be 35.1 MW. By 2026 it is forecasted to **cover 40 % of the electric consumption through solar energy.**

Low Carbon Emission Products with Circular Product and Process Design

Norm Fasteners Bolts has developed **Hexlight®, NOW@LIVETM, EXTREMELIGHT®** and **Hold&Drive** brands that have lower carbon emission in relation to use of reduced weight and raw material use reduction in line with Norm Fasteners Bolts sustainability goals.

Electrification Efforts

Renewal of heat treatment furnaces started in 2022. Two furnaces in Norm Fasteners Bolts Salihli facilities and 2 furnaces from Norm Fasteners Screws factory have been replaced with Powermax hybrid furnaces.

40 m3 less natural gas was consumed per ton production in Norm Fasteners Bolt Salihli facilities. In Norm Fasteners Screw natural gas consumption decreased by 45-55 m3 per ton production. It was found that hybrid furnaces are about 30% more efficient per ton production.



Energy Efficiency

- With the **Swimming Ball Project** for the surface treatment facility within the scope of R&D works in Norm Fasteners Nuts factory, 50% energy saving and decrease of 80% in heat loss is targeted.
- With the **drum design change** electric and water consumption is aimed to be reduced. By changing the drum design in zinc-nickel coating facility where the most electricity is consumed in Norm Coating facility, current density on unit surface has been reduced. After the improvement for electric transmission point has been reduced to two and losses caused by loose contact has been reduced by 50%. Electric consumption saving of 19% has been achieved per product.
- At least 15% electricity saving is expected by replacing 15 kW IE2 turbine motors of the sanding machines with IE3 efficient motors.
- **Light Tubes Project** has been initiated in Norm Tooling heat treatment facility for energy saving. Thus, natural light is used for lighting and energy consumption for lighting during the day has been reduced to zero. Using long lasting and maintenance-free light tubes, 1,460 kg CO2 emission has been avoided. Project has been implemented in Norm Fasteners Bolts Izmir facilities.
- For **ambient heating** waste heat is being used in Lamella Coating department. The project aims to reduce natural gas consumption by an average of 15% during the winter months. On average monthly 750 m3 natural gas saving has been achieved.
- 80% of lighting in Norm Coating 2 has been replaced with LED fixtures. Norm Fasteners Nuts also switched to led fixtures. Project return time is calculated as 2.5 years.
- In offices fluorescent bulbs are replaced with motion sensor bulbs to save energy.
- In Norm Fasteners Bolts Izmir facility heat insulation of 4 furnaces has been projected. After insulation 8% energy saving is expected. Project will be commissioned in 2024.
- In 2024, decarbonization roadmap studies will begin for Norm Fasteners Bolts Izmir, Norm Fasteners Bolts Salihli, Norm Fasteners Nuts, Norm Coating and Norm Fasteners Screws companies. Project includes emission analysis, peer analysis and decarbonization scenarios.

WATER MANAGEMENT

Water management of the Holding focuses on preserving fresh water sources, efficient use of water and reuse targets. Holding aims to reduce the amount of water drawn per production in 2030 by 30% compared to base year of 2020. Furthermore, it commits to increase water recycling and reuse ratio to 50% by 2030.

Water and Wastewater Data	2021	2022	2023
Water Consumption (m3)	731,415.47	780,447.10	863,470.42
Wastewater (m3)	660,382.56	620,158.23	777,123.38

Artesian Water Quantity (m3)	2021	2022	2023
Norm Fasteners Salihli	29,549.50	21,462	20,108
Norm Fasteners Nuts Salihli	41,478.00	65,645	29,995
Norm Coating Salihli	-	61,938	98.130

Water Intensity Data

Water Intensity (m3/ton production)	2021	2022	2023
Norm Fasteners Bolts	1.43	1.52	1.32
Norm Fasteners Screws	4.20	2.93	2.21
Norm Fasteners Salihli	1.77	1.38	1.46
Norm Fasteners Nuts	2.12	2.83	2.69
Norm Coating	4.60	4.59	5.37



In the production facilities of the Holding, there are blow-off waters from cooling towers, wastewater from reverse osmosis and domestic wastewater. Wastewater are discharged into the sewage system of the Organized Industrial Zone (OIZ). Norm Fasteners and Norm Coating factories have pretreatment facilities.

Within the frame of SDG 17: Partnership for the Goals, Holding attaches importance to cooperation in ecosystem for preserving fresh water sources and reducing wastewater. It provides data and information to water management projects of the OIZs it operates in and actively contributes to cooperation.

Wastewater Treatment Facility Renewal Projects

In 2022 Norm Coating Izmir wastewater treatment plant (WWTP) revised and in 2023 Norm Coating Izmir facility WWTP was rebuilt, WWTP in Norm Coating Salihli 1 Factory was renovated. In 2023 Norm Coating Salihli 2 factory is planned to commission renewed wastewater facility. Within the scope of wastewater treatment improvements, chemicals helping treatment are changed and filter press was renewed.

Transition to Air Cooled Systems

In 2023, water plated exchanges system of 8 furnaces were replaced with air cooled system in Norm Fasteners Bolts Salihli factory. These changes saved approximately 1,500 m3 water each month.

At the heat treatment section of the Norm Fasteners Bolts Factory in Izmir, furnace beds, atmosphere fans, irrigation, and blackening oils have been switched from water-based systems to air cooling systems. In addition to the high water consumption, the amount of chemicals used for the pools have also been eliminated. Air cooling systems are being gradually implemented in line with the furnace maintenance schedule.

At the Norm Fasteners Screws Factory in Salihli, the cooling system has been streamlined, system inputs minimized, and air cooling systems have replaced water cooling systems. It is expected that this change will result in savings of 3,600 m³ of water, 1,225 kg of pool chemicals, and 533,952 kWh of electricity annually.

Close Circuit Cooling System Project

Pretreatment redressers used in current control in zinc-nickel facility has water cooled systems. Since this system has open circuit, it causes continuous water consumptions. Redresser cooling system has been changed to circulate and added to the cooling group currently used in coating baths. Thus, water from the redresser can be cooled and fed back. Annually 26,956.80 m3 water is saved with this project.



Zero Discharge Project

In 2023, a project was initiated at the Norm Coating Sakarya facility with the objective of treating process wastewater through evaporators and reusing it as distilled water. The project improves water efficiency, reduces wastewater and emissions, and also lowers energy and waste disposal costs.

Zinc Recovery from Wastewater Project

Under the TÜBİTAK 1505 - University-Industry Cooperation Support Program, a project was initiated in 2023 in collaboration with Katip Celebi University. The project aims to reduce the pollution load in wastewater through chemical oxidation and carbothermal reduction methods, with the goal of recovering pure zinc from waste sludge.

Facilities Capable of Operating with Secondary Quality Water Tolerance

Necessity to use high quality water in production processes increase freshwater consumption. Efforts started for facilities suitable for treated water use are expected to reduce consumption from freshwater sources.



WASTE MANAGEMENT AND CIRCULARITY

To support circularity and reduce its environmental impact Norm Holding aims to

- Reduce waste per production by 15%
- Reduce packaging waste by 50%

The Holding and its affiliated companies conduct waste management in accordance with local regulations. Norm Fasteners Bolts Izmir and Salihli, Norm Coating Izmir Salihli, Norm Fasteners Nuts Izmir and Salihli have Zero Waste Certificate. Trainings are conducted to raise awareness of employees.

In the Holding factories, all measured parameters including CO, SO2, NOX, TOC, VOC, etc. were found to be within legal emission limits in the periodical emission analyses conducted by accredited laboratories in accordance with air pollutant regulations. These reports are prepared within the legally required timeframes and ensure full compliance with environmental regulations.

Waste Type	2021	2022	2023
Non-hazardous Waste (tons)	18,878.63	19,989.95	19,297.21
Hazardous Waste (tons)	2,108.86	1,402.52	3,299.18

Waste by Disposal Method (tons)	2021	2022	2023
Recovery	20,515.84	21,389.62	22,596.31
Other Disposal	471.66	2.86	0.09
Total (tons)	20,987.50	21,392.48	22,596.39

Based on the waste hierarchy, the Holding is focused on preventing and reducing waste, especially hazardous waste, and is working to increase rates of reuse, recycling, and recovery.



Sandblasting Surface Cleaning Technique Modernization Project

In the project done in Norm Fasteners Nuts Izmir facility, phosphating process is replaced with polymer coating to reduce the amount and types of waste. Instead of non-recyclable phosphate sludge, recycling and reuse waste codes have been obtained for the waste of the new process with TÜBİTAK analyses. The facility is planned to be installed in Salihli Nuts as well in 2024.



Erosion Resin Waste Project

Within the project started in February 2023, annual resin waste has been reduced by 12%.

Cold Forming Oil Mist Prevention Project

With the project in Norm Fasteners Nuts 1 factory, aim is to reduce the amount of oil used by 25% and air pollutant emissions by 65%. This application will be extended to the whole factory.

Design and Simulation Studies on Cold Forming Molds

In the design and simulation studies conducted with the molds that have the highest consumption, significant efficiency gains have been achieved through savings in mold wear and a reduction in mold-related downtime during production.

Increasing Strength of Mold Cores

In the project developed in 2023 in collaboration with Boehlerit Hard Metal Products, the aim is to make mold cores more durable, stronger, and longer-lasting.

Vapor Suction Systems Project

To prevent metal treatment steam from harming employees, oil vapor suction systems have been implemented in 27 machines in the CNC line. These systems draw in and filter polluted air and provide clean air while preventing occupational accidents and maintaining machine performance.



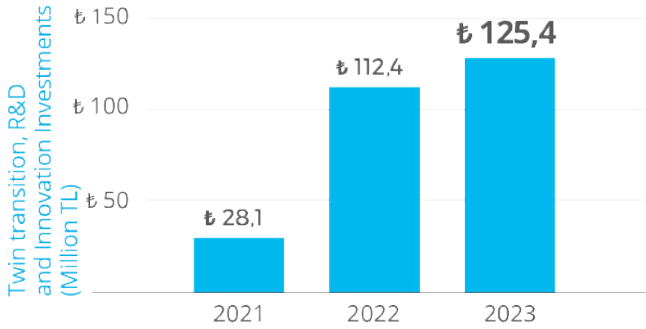
While advancing our green transition projects, we are investing in **twin transition**, focusing on circular processes and product design.



TECHNOLOGY MATTERS

Norm Holding supports twin transition in its ecosystem through **Technology Matters** approach and views R&D and Innovation and circular product and process design as key drivers for preparing the Holding and its stakeholders for the future while leaving a more habitable world for the future generations. Activities under Technology Matters are coordinated by the **R&D and Innovation** work group within the Sustainability Committee.

By 2030, it is targeted to increase R&D expenditures to 2% of the Holding's turnover, with 30% of these investments being directed towards sustainable product projects.



R&D Investment to Turnover Ratio	2021	2022	2023
Norm Fasteners Nuts	0.381%	0.234%	0.296%
Norm Fasteners Bolts	1.20%	1.36%	1.45%
Norm Tooling	0.7%	2.87%	3.85%

To encourage innovation, within the framework of the Intellectual and Industrial Property Rights (IPR) Policy established in 2022, the Holding acquires patent rights for new products and solutions developed under R&D activities, while also safeguarding the intellectual and industrial rights of its employees.

R&D AND INNOVATION

Norm Holding, one of the institutions in Türkiye with the highest R&D investments, focuses on the development of high-value-added, sustainable products with patent potential in its R&D and innovation efforts. Norm Holding aims to reduce the environmental impact of its products and processes through circular product and process design and developing various strategies for this purpose.

- These strategies are:
- Prolonging life cycle of products
 - Increasing material efficiency and reducing product weight
 - Reducing waste and using sustainable materials
 - Optimizing energy consumption

As of 2023, the number of R&D centers under the Holding reached 4 with the approval for Norm Tooling R&D Center. Additionally, Norm R&D Application Center has been approved as a test center in 22VW 60252_Axial vibration test process held by Volkswagen through IfEP.

R&D Centers are managed by a team of graduate and PHD engineers. Employee development is supported. Through 2023 R&D teams joined 13 technical trainings.

Number of R&D Employees	2021	2022	2023
Norm Fasteners Nuts R&D Center	19	19	19
Norm Fasteners Bolts R&D Center	48	51	55
Norm Tooling R&D Center	19	20	21

Aiming to continuously increase scientific and technological expertise and foster a culture based on this approach, Norm Holding collaborates with national and international universities, R&D and design centers, research institutions and other companies.

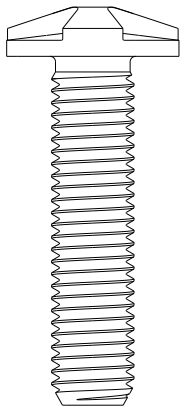
Number of University Cooperation	2021	2022	2023
Projects	3	4	13
Theses	10	14	8

2023 R&D AND INNOVATION PROJECTS

EXTREMELIGHT® Product Group

- Impact:
- Resource Efficiency
 - Reducing Scope 3 Emissions

Developed within the scope of weight reduction efforts in the automotive industry, EXTREMELIGHT® product is specifically designed to have less weight compared to traditional fasteners. It is regarded as a significant innovation in the automotive industry.



NOW® LIVE™ Weight Reduced Non-Detachable Fastener Study

- Impact:
- Resource Efficiency
 - Reducing Scope 3 Emissions
 - Waste Reduction

The project aims to make automotive fasteners lighter, more efficient and sustainable while also reducing waste. Weight reduction is especially significant in electric and hydrogen-powered cars.

Applied for patent in 2023, Now@Live™ product provides a special fastener and assembly tool. This product reduces vehicle weight and thus increases energy efficiency, reduces carbon emissions and removes post-assembly waste caused by traditional cut fasteners.

NORMSELF® product Dog Point version

- Impact:
- Resource Efficiency
 - Waste Reduction

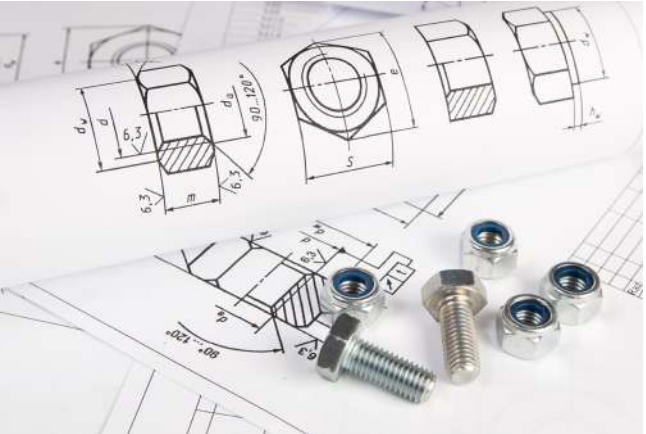
In 2022, the commercial production of the NORMSELF® series began, and as a solution to a problem faced by an electric vehicle manufacturer, the Dog Point version was developed. This new product addresses the issues with the positional tolerance of plates in the assembly area.

Commissioning of Hexlight® product

- Impact:
- Resource Efficiency
 - Waste Reduction

Among the Hexlight® products produced for automotive industry, patented in 2022 with reduced weight, M10x35 hinge bolts have completed safety and quality tests and started production.

The sample production of M16-M18 products, assembled using the Hold&Drive fastening method in 2022, continues successfully with retention and FST10 tests. M16 product group is planned to start mass production in 2024.



Stainless Steel Bolt Production

- Impact:
- Waste Reduction

Norm Fasteners Bolts R&D Center produces products in the A2-70 standard to meet the growing demand for stainless steels due to their high strength. With the rise of electric vehicles, the importance of these materials has increased. The center has expanded its product range by starting the production of flanged hexagon bolts, aiming to increase market share both domestically and internationally.

Other R&D and Inovation Projects in 2023

Project	Impact	Project Details
Design and Simulation Studies in Cold Forming Molds	- Resource Efficiency - Reducing Scope 3 Emissions	Mold becoming scrap due to wear, tear and lack of maintenance causes costs and loss of time. In 2023 R&D center ran an extensive project to increase cold forming molds. Upon design and simulation works 167,257 Euros were saved and production time was decreased by 376.5 hours.
Installation of Sandblasting Polymer Raw Material Surface Cleaning Facility	- Reducing Scope 3 Emissions	In the project conducted in Norm Fasteners Nuts Izmir facility to reduce environmental impact of raw material surface cleaning process and to reduce OHS risks, sand blasting raw material surface cleaning facility was installed, waste production and water consumption has been significantly reduced. Also, recyclable waste codes have been defined with TÜBİTAK analyses. A similar facility is planned to be built in Salihli factory in 2024.
Increasing the Durability of Mold Cores	- Resource Efficiency - Reducing Scope 3 Emissions	In the project developed in collaboration by Norm Tooling R&D Center and Boehlerit Hard Metal Products, tungsten carbide cobalt materials properties are functionally improved. This improvement aims to increase efficiency, reduce costs and raise customer satisfaction by making mold cores more robust, strong and long-lasting.
Surface Treatment Floating Ball Project	- Reducing Emissions - Reducing Waste - Improving OHS performance	In a project initiated at Norm Fasteners Nuts in January 2023, the goals are to achieve 50% energy savings, reduce environmental impacts by 80%, lower costs by 45%, and improve OHS metrics.
Cold Forming Oil Vapor Prevention Project	- Reducing Emissions - Reducing Waste	In a project launched at the Norm Fasteners Nuts factory in December 2023, oil vapor in the production lines of the cold forming section, particularly in areas without ventilation, is condensed and recovered back into the machinery. This initiative aims to achieve a 25% reduction in oil usage and a 65% decrease in emissions.
Thread Rolling Performance Measurement Apparatus	- Resource Efficiency	Test mechanism designed for quality control of NORMSELF® products is suitable for use in any fastener where thread rolling performance needs to be measured. Mechanism aims to make quality control in production more efficient by increasing reliability of fasteners.

Production of Ultra-High Strength Fastener

- Impact:
- Waste Reduction

In 2023, to meet the growing demand for ultra-high strength fasteners, production recipes were developed for strength classes 14.8 and 14.9, going beyond the high strength classes of the ISO 898-1 standard. Prototypes of fasteners in the 16.9 and 17.9 strength classes were also produced. Efforts are ongoing for the transition to mass production. The studies have resulted in the development of high-performance and highly durable fasteners by utilizing different materials and heat treatment methods.

Intellectual and Industrial Property Right

An extensive **Intellectual and Industrial Property Rights (IPR) Policy** was established in 2022 to increase intellectual capital sustainably, preserve competitive strength of the Holding and to support innovation.

Policy regulates principles rights and responsibilities, processes that need to be observed in accordance with the legislation required to be practiced in the Holding regarding protection of intellectual and industrial property rights of new products and solutions.

By the end of 2023 Industrial Design applications made within Norm Holding reached 10 and all were registered. 1 is registered as international design and 9 as domestic design.

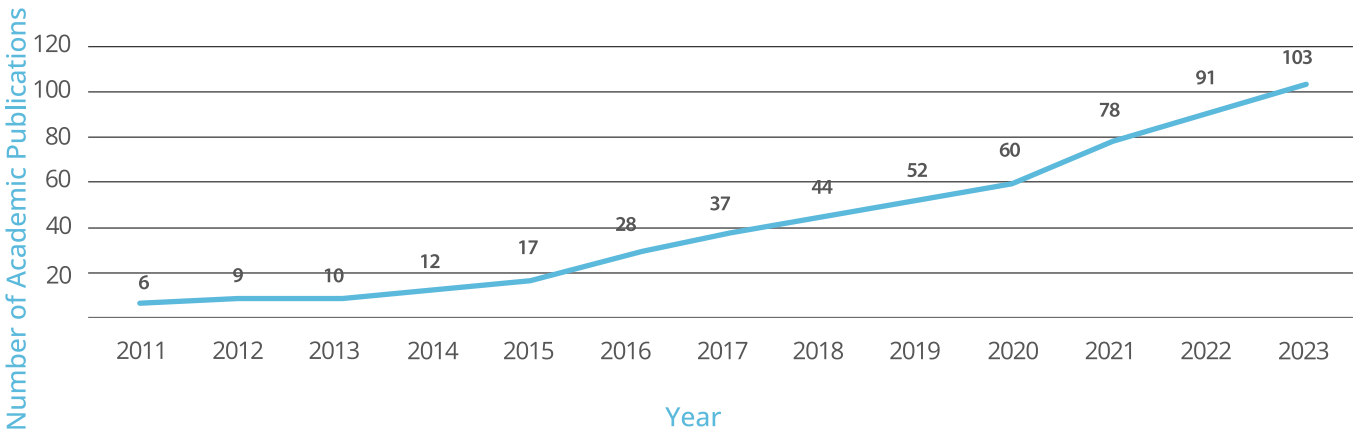
By the end of 2023, number of patent applications by Norm Holding reached 37.

Total Number of Applications and Registrations Under Intellectual and Industrial Property Rights of Norm Holding Companies

Norm Holding	Total Applications	Total Registrations	National Registrations	International Registrations
Patent Application	37	18	12	6
Utility Model	8	7	7	0
Industrial Design	10	10	9	1



12 academic publications were made in 2023. The goal is to increase the number of scientific publications to 20 by 2025.



Preparations for a 50th anniversary portfolio booklet containing all IPR applications of Norm Fasteners Bolts R&D Center has begun. Aimed to be in R&D Center resources as of 2024, this booklet will combine the extensive efforts of the company on IPR.

Patent Başvuru Sayısı	2021	2022	2023
Norm Fasteners Cıvata	2	4	6
Norm Fasteners Somun	0	0	1*
Norm Tooling	0	0	1
Norm Coating	0	0	1
Norm Additive	0	1	0

*Joint patent application of Norm Fasteners Bolts and Norm Fasteners Nuts, both under Norm Holding.

Number of New Products	2021	2022	2023
Norm Fasteners Nuts	535	533	440
Norm Fasteners Bolts	2,241	2,591	1,372
Norm Tooling	0	0	1

2023 patent applications

- Patent process has begun for reduced weight NOW® LIVE®™, which is developed by Norm Fasteners R&D Center and considered an important innovation in automotive industry.
- Applications for international patent and US Patent and Trademark Office (USPTO) has been made under PCT for NORMSELF®, product that offers connection without thread rolling during assembly.
- A patent application was filed in July 2023 for the test setup designed for the quality control of NORMSELF® products. In April 2023 patent application of EXTREMELIGHT® product has been granted by Turkish Patent and Trademark Authority. As of September 2023, European Patent Convention (EPC) and USPTO applications have been made for EXTREMELIGHT® product. These are the first applications made in Europe and USA by our Norm Fasteners Bolts R&D Center.

TWIN TRANSITION

While digitalization and automation reshape the dynamics of the modern business world, it plays a major role in achieving our sustainability goals. The rapid advancement of technology offers businesses the opportunity to increase operational efficiency, manage energy and resources more effectively, enhance transparency and traceability in the value chain.

Twin transition strategy which envisions digital and green transitions as mutually supportive processes enables corporations and societies to increase their competitive strength while reducing their environmental impact and thus create a more sustainable model. Norm Holding has made twin transition a part of its strategy.

Solutions such as instant monitoring of data and processes, rapid response to problems, inventory and order planning, route optimization enabled by data analytics, robotic process automation (RPA) and internet of things (IoT) increases sustainability performance and apart from lowered costs and increased quality, it offers transparency and traceability, accelerating sustainability transformation. Digitalization also improves OHS performance. When corporations invest in digitalization they do not only accelerate green transition but also both create a safer work environment for their employees and contribute to preparing the society by creating a workforce with increased digital capabilities.

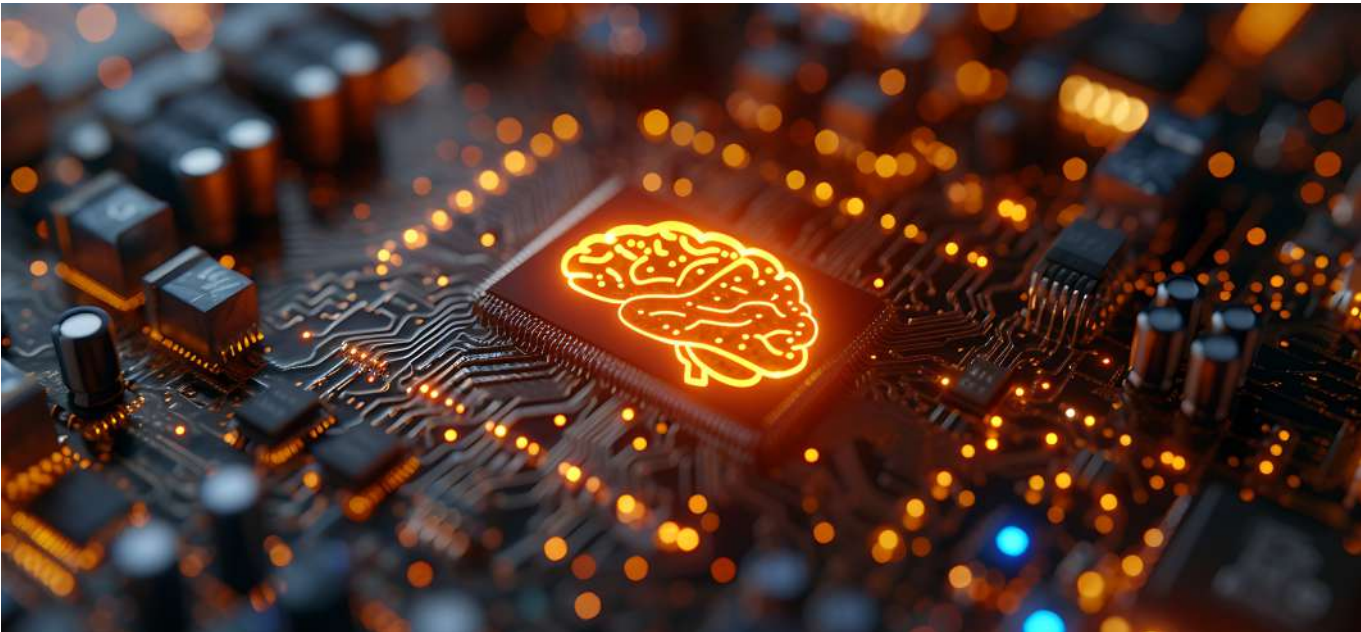
Twin transition strategy of our Holding focuses on data analytics, RPA, IoT, system and network improvement,

automation of production processes with smart automation technologies, artificial intelligence and data analytics, SAP and integration of digital platforms. Management and application of twin transition projects within the holding is done by Norm Digital with 150 employees. In the works within this scope, **number of processes assigned digital robot software of the Holding; Normie was raised from 73 in 2022 to 208 in 2023. This expansion resulted in a labor savings of 12,600 hours.**

One of the cornerstones of twin transition is increasing digital capabilities of the labor force. Holding has founded Digital Transformation Academy to improve the digital maturity level and improve digital capabilities. With the contribution of the operations of the academy, **Digital Maturity level rose from 54.765 in 2022 to 55.95 in 2023.** The completion of the Digital Transformation Academy training programs is targeted by 2025.

Holding offers various programs that support digital capabilities within the scope of preparing young talents to the future, which is the intersection of our **Human Matters** and **Technology Matters** approaches.

- SAP Academy offers a 9 month training to young talents that seek a career in SAP.
- DigiConnect Online Development Program offers online trainings to youth and students to increase their digital capabilities and their career development



2023 Digital Transformation Projects

Paperless Factory and Office Projects

With extension of Paperless Factory and Office Project which started as pilot in 2021, all production forms have been transferred to digital platforms in 2022 and 2023. Through this project, real-time access to engineering and production data, efficiency information, maintenance requests, and the QDMS document system is provided via tablets, resulting in significant benefits such as improved efficiency, time savings, reduced paper consumption, and enhanced process optimization. The digitalization of office processes continued throughout 2023.

- **Digitalization of travel request and monitoring processes**
- **Transferring expense and advance processes to digital environment**
- **Digitally approving bank orders and independent documents online with electronic signature.**
- **Moving company promotion materials to digital environment with NdigiCard application**

Digitalization of Planning Processes

The digitalization of planning processes has improved the quality of analyses and forecasts, ensured efficiency and process standardization. Transparency increased in business processes and an effective control mechanism has been established.

- **Stock projection and profitability analysis project:** Launched in 2023, the project is continuously being developed, and efforts will continue in 2024. Sipariş öngörüsü paylaşmayan veya sipariş .
- **Forecast accuracy project:** For customers who do not share order forecasts or share short-term order forecasts, demand forecasting is done using machine learning for demand planning. Development work will continue in 2024.
- **Cold Forming PPDS works:** Studies are being carried out to implement PPDS for planning activities in cold forming processes. Development work for the project will continue in 2024.
- **Inter-location transportation calculation in the S&OP cycle:** Development for calculations of moving between locations as IBP output will continue in 2024.

Digitalization of Sales Processes

Real-time reporting and analysis capabilities offered in financial processes have also been established for sales processes.

- **Foreign companies Global B2B platform:** A Global B2B platform has been developed for Norm Fasteners Romania, Poland and STD customers abroad.
- **Performance improvements and version update works in B2B platform:** With version updates to STD in Türkiye and ST Trading Poland B2B platforms to increase operation speed and efficiency.

Digitalization of Field Operations

By digitalization of field operations, both operational efficiency and standardization have been achieved.

- **Special stock and cross actions regulation efforts:** Improvements made for panel controls and authorized staff. Training sessions have been provided to field workers as part of the project.
- **Smart gloves for customer label verification and KPI tracking in handling operations (Digital Storage):** The project aimed at reducing customer complaints by preventing tagging based errors and enabling performance of daily handling operations to be traced with KPIs, will continue in 2024.
- **Measuring bolt production standards with a mobile phone camera:** Mobile app developed in Kalybe.AI company makes estimations of the quality standards on instant photos taken from different angles using image processing and artificial intelligence. Runner up in Road to Faster Innovation 2023 contest of Fastener Fixing magazine.
- **Establishment of the STD Supplier evaluation system (Supply Chain Visibility):** Works on the system that allows monitoring and evaluating suppliers in many areas such as packing, deadline, quality standards, compliance, ESG criteria will continue in 2024.
- **Digital reflection of Norm Tooling mold work lists on the field:** Efforts towards mold production plans being made in digital environment and reflected to kiosks and tablets in the field will continue in 2024.

Streamlining of Office Processes

In the office process streamlining projects, information technology infrastructure has been simplified, repetitive tasks in business processes have been reduced and human resources have been directed to more strategic fields and overall performance of the organization improved.

- **Transport management application:** Project for managing domestic transport request created for sending or bringing in materials through InFlow management system.
- **Human resources request management application:** By moving Human Resources and Administrative Affairs request processes to digital environment, request can be traced and reported in different approval flows.
- **Customer and supplier creating, change, extension request and monitoring application:** The customer and supplier account master cards are transferred to the InFlow management system, enabling their approval and record-keeping through digital environment after undergoing relevant unit controls.
- **Norm Holding Document Management System:** A Microsoft Share based Norm Document Management System has been implemented. This system streamlines file hierarchy and improving manageability while provides efficiency and security by protecting corporate data integrity .

- **End to end digital processes with RPA:** Through this project, processes have been fully digitalized, resulting in increased efficiency. Processes such as invoicing, sending documents to customers, identifying and correcting delivery issues in queues have been automated. From 2021 to 2023, a total of 207 processes were digitalized using RPA, saving 48 labor hours. In 2023, efforts were made for 142 processes, saving 36 employee hours, which were redirected to more efficient areas.
- **SAP Integration Projects:** As part of Norm Holding's SAP projects, IT infrastructure has been streamlined and processes accelerated by implementing solutions such as S/4HANA, SuccessFactors, Sales and Commerce Cloud, and it.mdsADD, resulting in improved efficiency.
- **SAP RISE transition:** In 2023, as part of the transition to SAP's new platform, RISE, the migration of SAP systems to the cloud is underway. Preparations for transition to RISE started in September 2023 and expected to be completed in 2024.
- **Expansion of the Norm CRM application:** The project to establish a joint CRM structure, which was among Norm Holding 2023 strategic goals started in May 2023. It is planned to be completed and commissioned in first half of 2024.



We evaluate each of our investments
in terms of their contribution to
sustainable development.



**WORK
MATTERS**

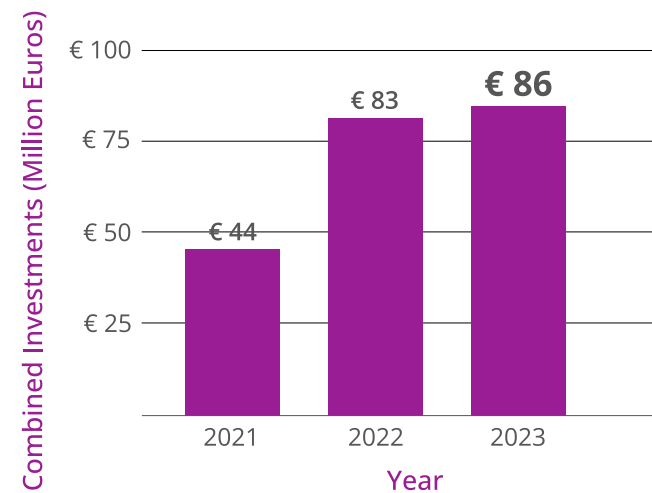
WORK MATTERS

With its **Work Matters** approach, Norm Holding actively supports sustainable development to leave behind a developed, fair, habitable world to its customers, employees, society and future generations. The core of the holding's business model is based on:

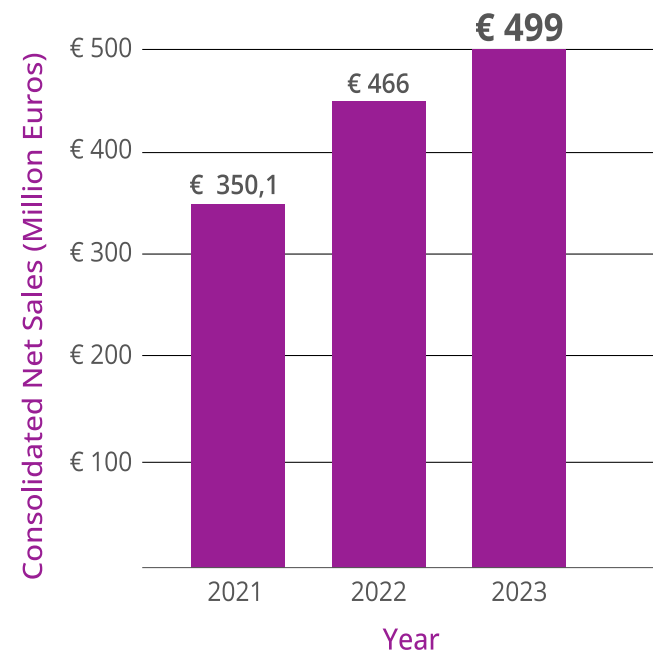
- Developing high added value quality, safe and innovative products,
- Responsible investment,
- Observing corporate governance principles,
- Reducing environmental impact and greenhouse gas emissions in production processes and value chain,
- Creating a sustainable supply chain,
- Creating a positive social impact and competent labor force that can adopt technological developments.

ECONOMIC PERFORMANCE

Combined Investments



Consolidated Net Sales



* Norm Holding net sales excluding its oversea subsidiaries.

Along with global and local inflation, monetary tightening, geopolitical crisis and difficulties in accessing finance, impact of natural disasters in Türkiye crippled economic growth. Geopolitical crises in the region causes delays in supply chains, problems in procuring raw materials and increase in costs. In this process, strategic steps such as modernization of production processes, shortening delivery times, investing in new production facilities and providing technical support to customers has become critical in overcoming such challenges in the supply chain.

Environmental regulations such as EU Green Deal, Carbon Border Adjustment Mechanism and strengthening of the standards increased the impact of sustainability strategies on competitive strength. It has increased the importance of developing a holistic approach including environmental, social and economic factors. In the holding's flagship sector of fasteners manufacturing, key global trends include twin transition, decarbonization, and supply chain management.

The shortage of skilled labor that began with the pandemic continues to impact the industry. On the other hand, advances in technology and rapid digitalization increases the needs of new capabilities. Ensuring access to comprehensive training for the workforce and closing the skills gap are essential for the sector's sustainability.

Despite global and local challenges, Holding had a successful year with its strong financial and capital structure.

Norm Fasteners Bolts Salihli and Norm Fasteners Nuts raised their A+ (High Credit Quality) rating in 2022 to AA- (Very High Credit Quality) in 2023 while Norm Fasteners Bolts Izmir retained its rating of A+ (High Credit Quality).

Holding increased its sales volume by 3.6% and net sales revenue by 7.5% in 2023, compared to previous year. Net consolidated sales of the Holding for 2023 was **499 million Euros**.

RESPONSIBLE INVESTING

Investment strategies and programs of the Holding and its affiliated companies are run by Investment Committee under the Board of Directors. Working principles of the Investment Committee can be found in **The Board of Directors Committees** section of the report.

Holding evaluates its investment decisions together with their environmental and social impact within the scope of responsible investment. Twin transition, circular and low carbon emission product and process design, R&D and Innovation, renewable energy, energy efficiency and operational efficiency projects as well as facility development are the focus of investments.

In 2023, the combined investments, which were 83 million Euros in 2022, increased to 86 million Euros, while environmental investments were raised to 4 million Euros.



2023 Investments

- Roof-type solar energy plants (SPPs) investments that started in 2021 with Norm Coating, Norm Fasteners Nuts, Norm Fasteners Screws, Norm Fasteners Bolts Salihli and Norm Tooling companies continued in 2023 with **2 million Euro budget**. Detailed information of SPP investments can be found in **Planet Matters** section of the report.
- Decarbonization roadmap project which started in 2022 has been made more extensive with Norm Fasteners Bolts Izmir and Salihli, Norm Fasteners Nuts, Norm Coating and Norm Fasteners Screws companies in 2023. Decarbonization efforts will continue in 2024.
- In 2023 total of **9.4 million Euros** worth of building repair and construction investment has been made. These investments are done to increase production capacity, increase efficiency and to modernize the technological infrastructure of the facilities. With these investments it is aimed to achieve higher performance and quality in operational processes.
- **1 million Euros repair and maintenance investment** has been made to production facilities. These investments provide resource and energy efficiency reducing costs, decreasing carbon footprint and increasing occupational safety.
- Within twin transition investment of **946 thousand Euros** has been made in Norm Fasteners Bolts Izmir and Salihli, Norm Fasteners Nuts and Norm Fasteners Screws. Through the investments, automation systems have been developed to increase efficiency in production processes, data analytics solutions have made business processes more predictable and manageable, and the integration of digital platforms has enabled all operations to be managed more transparently and holistically. Detailed information on the twin transition projects can be found in the **Technology Matters** section of the report.
- Holding creates impact beyond its own value chain by investing in financial instruments that fund sustainable projects. With this scope holding's investments in sustainable deposit products that fund projects supporting gender equality and circular economy models.

CUSTOMER SATISFACTION

Norm Holding Industry Group raised its number of customers to 353 in 2023. 221 of its customers are exporters. Trade Group has 1,685 customers with 65 exporters.

Holding's customer satisfaction approach is based on high quality and safety standards, innovative and technological solutions to customer specific needs and customer experience optimized and improved with digital processes.

Key Account Management (KAM) department founded to increase customer satisfaction creates a single communication point for all customers and especially OEM industry and enables quick response to customer demands and expectations. Created with gender equality principles in mind, KAM team raised the share of sales in the turnover from 29% in 2018 to %35 in 2023.

To integrate customer satisfaction into the business culture, the “ENLider Sensin” management training program was launched in 2020.

Customer portal automated dynamic software robot **Normie**, developed in 2019 to increase efficiency both for the company and the Holding by improving customer experience, faster responding to demands and increasing traceability, can provide automated ordering and tracing option for customers.

Principles and means for protecting legal and contractual rights of customers and stakeholders are defined in **Norm Holding Stakeholders Policy**. Customer and stakeholder complaints and notices are accepted through the **contact form** on the Holding website. Complaints are efficiently managed, solutions are offered and continuous improvement is supported. No complaint has been received from the customers within the scope of Stakeholders Policy during the reporting period.

Commercial secrets of the customers are protected in line with legal regulations and industry standards within the scope of **Information Security Policy**.

2023 Customer Satisfaction Survey

Norm Holding holds satisfaction surveys for customers of Norm Fasteners Bolts, Norm Fasteners Nuts and Norm Fasteners Screws through independent research companies since 2018. The surveys utilize five-point Likert Scale.

According to the 2023 survey results, overall satisfaction score is 4.3 points (90%) for domestic customers and 3.75 points (78%) for international customers. The overall satisfaction score is 4.09 (86%).

Year	Customer Satisfaction Survey Result
2020	4.1
2021	4.08
2022	4.21
2023	4.09

The results of the customer satisfaction survey are assessed with the participation of the Board of Directors. Areas of improvement are identified, and action plans are submitted to the Board of Directors. The agreed-upon actions are communicated to the relevant departments and developments are closely monitored and reported.



PRODUCT QUALITY AND SAFETY

The Holding's **Quality Policy** is based on the requirements of international management systems and certificates along with local regulations. Policy focuses on compliance with legal requirements, creating a safe working environment, preparedness to extraordinary circumstances, preventing environmental pollution, sustainable resource use, energy efficiency and adapting to technological developments. Investments are made in technology, R&D and innovation to meet the needs of the global market. OHS, environment and energy performance are aimed to be continuously improved, with active employee participation.

Quality, environment, occupational health and safety management systems are executed under Integrated Management System Policy with a holistic approach. Holding and its affiliated companies holds many certificates demanded by OEM industry, which has high standards, including ISO 9001 Quality Management System, ISO 14001 Environment Management System, ISO 45001 Occupational Health and Safety System and ISO 50001 Energy Management System. At every stage of the products, quality control processes are performed in accordance with requirements of ISO 9001. In addition, product safety processes are managed in compliance with the requirements of the IATF 16949 Automotive Quality Management System and TS EN ISO 3918 certifications.

Integrated Management Systems

		IATF 16949	ISO 9001	ISO 14001	ISO 45001	ISO 50001	ISO 27001	YYS
Norm Fasteners	Norm Fasteners Bolts Izmir	Δ	Δ	Δ	Δ*	Δ		
	Norm Fasteners Bolts	Δ	Δ				Δ	Δ
	Norm Fasteners Nuts	Δ	Δ	Δ*	Δ*	Δ		
	Norm Fasteners Bolts Salihli	Δ	Δ	Δ*	Δ*	Δ		
	Norm Fasteners Screws	Δ	Δ	Δ*	Δ*	Δ		
	Norm Fasteners Bursa	Δ	Δ					
	Norm Fasteners Germany	Δ	Δ					
	Norm Fasteners Golcuk	Δ						
	Norm Fasteners America	Δ	Δ					
	Norm Coating	Δ	Δ	Δ	Δ	Δ		
Trade Group	Norm Tooling	Δ	Δ					
	Norm Additive		Δ					
	Norm Forging		Δ			Δ		
	NRM							
	Norm Digital						Δ	
	STD		Δ				Δ	Δ
	Norm Fasteners Romania		Δ					
	ST Trading		Δ	Δ				

* Certification inspections are completed in 2023 certificates have been granted in 2024.

INTERNAL AUDITS AND
CUSTOMER AUDITS

Norm Holding and its affiliated companies have established an efficient internal audit mechanism for its production processes as required by the certificates they hold. Standard inspections such as CE, TSE, IATF 16949 and ISO 9001 certification inspections are also performed. Furthermore, in line with the high quality and safety standards of the industries it serves, it undergoes numerous customer audits every year.

A total of 25 standard inspections have been conducted within the scope of CE and TSE certifications, IATF 16949 and ISO 9001, in 2023.

16 IATF 16949 and 4 ISO 9001 inspections have been completed in a total of 39.5 days. In 2023, 15 factories under the Holding have been subjected to IATF inspections. As a result of the division in 2023, IATF certification inspections of Norm Fasteners Bolts Izmir and its support fields (Norm America, Norm Germany, Norm Golcuk and Norm Bursa) have been renewed in December. Additionally, Norm Forging ISO 9001 Certification have taken place.

In order to spread the best practices across the Holding with its affiliated companies and to identify non-compliance in the field, cross audits are done systematically with participation of internal auditors. Within this scope, 312 internal audits were carried out in 2023. The findings identified during the audits and the follow-up on action plans are monitored through QDMS.

In 2023, customers, mostly from white goods and automotive industry have conducted 38 audits. Audits were completed in 49 days in total. Additionally, 32 self-evaluation demands from customers were responded.



OPERATIONAL EXCELLENCE

Operational Excellence System implemented in 2022 aims continuous improvement based on sustainability and standardization principles and to lead innovative practices in the industry. In this respect, Holding's **twin transition** strategy is an integral part of operational excellence efforts. While reinforcing communication and team spirit, system also promotes transparency, cooperation and teamwork.

System is based on the following principles:

- Sustainability and standardization
- Maximum stakeholder satisfaction
- Continuous improvement
- Leading new practices in the industry
- Communication and team spirit
- Transparency
- Collaboration and teamwork
- Maximum service level
- Innovation and technology

An extensive **Operational Excellency Procedure** has been developed for Norm Fasteners companies in 2023. This procedure covers OHS, environment and energy management as well as subcontractor and supplier practices and focuses on risk assessment, environmental impact analysis, energy efficiency and compliance with legal regulations and international standards.

In the Holding and its affiliated companies, operational excellency is handled as a team performance with **Together to Success** approach and supported with Kaizen method. Within the scope of Kaizen practices, employee suggestions are collected with QDMS mobile and web applications. Suggestions accepted in evaluations are implemented. Suggestions are scored within the framework of **Appreciation and Awarding Procedure** and rewarded every quarter. This practice increases employee motivation as it promotes employee participation to continuous improvement.

2023 Kaizen Data

Company	Number of Suggestions	Number of Completed Kaizens	Number of Ongoing Kaizens
Norm Coating Izmir	766	169	746
Norm Coating Sakarya	123	12	79
Norm Coating Salihli	702	166	523
Norm Fasteners Bolts Izmir	597	60	387
Norm Fasteners Bolts Salihli	493	172	41
Norm Fasteners Nuts Izmir	646	218	175
Norm Fasteners Nuts Salihli	943	243	144
Norm Fasteners Screws	196	70	126
Norm Tooling	562	53	269

2023 Operational Excellence Projects

PRODUCTION PROCESS DATA
COLLECTION PROJECT
(iBAPDA – LION)

With this data analytics project realized in Norm Fasteners Bolts Izmir facility, data collection and monitoring systems have been created in the production facility. As a result, potential issues in the production processes have been detected at an early stage. Within the scope of the project, process parameters are matched with production data and traceability and efficiency have been increased.

Production Management System
(O’Cean MES)

With the Ocea’N system developed by Norm Digital, digital field management has been implemented at Norm Fasteners Bolts in Izmir and Salihli, as well as at Norm Fasteners Nuts. This system has reduced paper usage and made processes more efficient through real-time reporting and analytics, allowing for better tracking. As of 2023, the system has 725 users across 304 tablets. For 2024, there are plans to expand the application to include raw material preparation, secondary processes, and workshop departments.



SUSTAINABLE SUPPLY CHAIN

Norm Holding adopts a sustainable supply chain management, that is based on ethics and human rights, while being respectful to the environment and society, all within the framework of corporate governance principles.

In 2023, the Corporate Governance Committee has established the **Responsible Purchasing Policy**. The policy defines the principles that the supply chain management must adhere to in areas such as human rights, working conditions, OHS criteria, business ethics, environment, supplier management, responsible raw material sourcing, intellectual property, information security, conflict minerals, and the protection of trade secrets. Additionally, to become a supplier to Norm Holding, a company must hold at least an ISO 9001:2015 certification or a certificate accredited by an IAF MLA member organization according to the latest revision of IATF 16949:2016.

Our trade group collaborated with 210 suppliers, including 173 domestic and 37 international. Our industry group worked with a total of 1,187 suppliers, consisting of 1048 domestic and 139 international.

Trade Group Purchasing Data - 2023

Distribution of Payments Made to Trade Group Suppliers	Unit	2021	2022	2023
Import Amount	%	9%	11%	8%
Domestic Purchase Amount	%	91%	89%	92%
Number of Oversea Suppliers	Number	62	40	37
Number of Domestic Suppliers	Number	150	155	173
Total Number of Suppliers	Number	212	195	210

Industry Group Purchasing Data - 2023

Distribution of Payments Made to Industry Group Suppliers	Unit	2021	2022	2023
Import Amount	%	47%	46%	37%
Domestic Purchase Amount	%	53%	54%	63%
Number of Oversea Suppliers	Number	126	160	139
Number of Domestic Suppliers	Number	1,140	1,091	1,048
Total Number of Suppliers	Number	1,266	1,251	1,187



Supplier Evaluation Mechanism and ESG Performance

Created in 2021, **Supplier Handbook** has been updated in 2023. The updated handbook introduces a more comprehensive supplier evaluation mechanism and incorporates practices for assessing ESG criteria. The evaluation criteria are based on 45% supplier performance score, 45% quality score and 10% sustainability score.

In 2023, as part of the **Supplier Sustainability Program**, 17 suppliers from the Industry Group and 10 suppliers from the Trade Group were included in the ESG self-assessment scope. After completing five surveys prepared on topics such as environment, energy, conflict minerals, greenhouse gas emissions, governance, and social aspects, verification meetings were held with suppliers to finalize the self-assessment process.

Supplier sustainability levels were evaluated on a five-point scale. According to the survey results, suppliers scoring under 70% are included in **Supplier Sustainability Program**. This program aims to identify and minimize sustainability risks originating from suppliers, while supporting and enhancing their sustainability capacities.

Sustainability Level	Score Range
Perfect	100 - 900
Good	89 - 70
Acceptable	69 - 50
Medium Risk	49 - 30
High Risk	29 - 0

- This program is planned to be expanded in the future. In this respect;**
- Applying ESG assessments to all suppliers,
 - Integrating ESG criteria into the selection of new suppliers,
 - Report non-compliance issues of current suppliers,
 - Providing awareness-raising training for high-risk suppliers,
 - Establishing mechanisms to evaluate data on conflict management and labor rights,
 - Transitioning supplier profiles to digital platforms is planned.

Digital Supply Chain Management

As in other processes Norm Holding is actively working to digitalize supply chain management. These efforts aim to ensure efficient management of the supply chain for both the Holding and its suppliers, enable monitoring of quality and safety standards, and measure environmental and social impacts. Furthermore, optimizing the demands and processes with fast and efficient data access is also aimed.

- In 2023, an integrated supplier management and tracking platform is established. Using SAP IBP Response & Supply and SAP IBP S&OP modules that allow scenario analyses, inventory projection and profitability analysis, a holistic structure has been created for supply, production and distribution operations.
- Supply Chain Stock and Production Budgeted-Realized Reports are moved to PowerBI platform, enabling automated reporting and real-time data access. Additionally, using artificial intelligence and machine learning, demand forecasts are made based on customer behavior, demand trends and market conditions. Project activities in this area are ongoing.
- Systemic stock and order method has been implemented in STD using Demand Driven Material Requirements Planning (DDMRP) method, automated order recommendations based on past data and deadlines have been created. Using data analytics, demand forecast accuracy has been increased. Supply chain reports are transferred to PowerBI dashboards providing real-time data access.



ANNEXES

PERFORMANCE INDICATORS

GRI INDEX

PERFORMANCE INDICATORS

ENVIRONMENTAL PERFORMANCE INDICATORS

Energy Consumption Data

Energy Consumption Data		Unit	2021	2022	2023
Direct Energy	Gasoline	liter	6,886	76,988	170,342
	Diesel	liter	377,720	297,958	377,720
	Natural Gas	m3	18,542,355	18,401,118	18,814,351
Indirect Energy	Electricity from Grid	kWh	97,456,604	108,620,043	120,323,140
	Renewable Energy Production (SPP)	kWh	1,767,189	3,105,442	4,557,529

Energy Intensity Data

Energy Intensity (MWh/ton production)	2021	2022	2023
Norm Fasteners Bolts	1.97	2.14	2.00
Norm Fasteners Screws	1.86	2.06	2.16
Norm Fasteners Salihli	1.82	1.63	1.74
Norm Fasteners Nuts	1.21	1.18	1.13
Norm Coating	0.56	0.58	0.62

Scope 1 and 2 Greenhouse Gas Emissions Data

Greenhouse Gas Emissions	Unit	2021	2022	2023
Scope 1 Emissions	tons CO2e	37,878.08	38,447.05	43,557.21
Scope 2 Emissions	tons CO2e	41,272.56	47,349.33	48,327.18

**Best Kale and Norm Fasteners Golcuk, which were not included in 2022 calculations have been included in 2023 emission reporting.*

Breakdown of Greenhouse Gas Emissions

Greenhouse Gas Emissions (tonsCO2e)	2021 Scope 1	2021 Scope 2	2022 Scope 1	2022 Scope 2	2023 Scope 1	2023 Scope 2
Norm Fasteners Bolts Salihli	12,703.07	8,603.21	13,131.30	10,716.21	13,506.34	12,381.44
Norm Coating	3,997.16	14,279.42	4,433.05	16,586.73	5,107.08	14,246.63
Norm Fasteners Bolts Izmir	11,460.98	6,719.31	11,078.96	7,238.71	11,521.83	6,451.28
Norm Fasteners Nuts	6,148.10	6,895.55	5,582.29	6,932.55	5,672	7,473.74
Norm Fasteners Screws	2,544.39	3,264.86	3,278.40	3,893.70	3,810.32	4,694.08
Norm Tooling	222.79	1,019.07	184.45	1,425.25	185.72	1,888.86
STD	560.38	193.03	537.2	208.95	597.23	215.48
Norm Fasteners Germany	31.39	18.66	36.7	31.66	42.28	26.19
NRM Engineering	29.21	93.75	28.56	122.87	20.22	119.07
Norm Fasteners USA	18.94	137.45	15.19	136.08	17.2	139.28
ST Trading	72.23	19.56	64.18	23.22	77.4	19.3
Norm Bursa	42.15	18.45	36.93	19.89	70.71	18.71
Norm Fasteners Romania	47.28	10.24	39.84	13.51	47.69	13.94
Norm Fasteners Golcuk	0.00	0.00	0.00	0.00	469.13	28.09
Best Kale	0.00	0.00	0.00	0.00	412.11	611.07
Total	37,878.08	41,272.56	38,447.05	47,349.33	41,557.21	48,327.18

**Best Kale and Norm Fasteners Golcuk, which were not included in 2022 calculations have been included in 2023 emission reporting.*

Carbon Intensity Data

Carbon Intensity (Scope 1 & 2) tons CO2e/ton production	2021	2022	2023
Norm Fasteners Bolts Izmir	0.47	0.52	0.55
Norm Fasteners Salihli	0.44	0.42	0.44
Norm Fasteners Screws	0.53	0.61	0.55
Norm Fasteners Nuts	0.32	0.32	0.31
Norm Coating	0.19	0.20	0.18

Water and Wastewater Data

Water and Wastewater Data	2021	2022	2023
Water Consumption (m3)	731,415.47	780,447.10	863,470.42
Wastewater (m3)	660,382.56	620,158.23	777,123.38

Artesian Water Consumption Data

Artesian Water Quantity (m3)	2021	2022	2023
Norm Fasteners Salihli	29,549.50	21,462	20,108
Norm Fasteners Nuts Salihli	41,478.00	65,645	29,995
Norm Coating Salihli	-	61,938	98,130

Water Intensity Data

Water Intensity (m3/ton production)	2021	2022	2023
Norm Fasteners Bolts	1.43	1.52	1.32
Norm Fasteners Screws	4.20	2.93	2.21
Norm Fasteners Salihli	1.77	1.38	1.46
Norm Fasteners Nuts	2.12	2.83	2.69
Norm Coating	4.60	4.59	5.37

Waste Data

Waste Type	2021	2022	2023
Non-hazardous Waste (tons)	18,878.63	19,989.95	19,297.21
Hazardous Waste (tons)	2,108.86	1,402.52	3,299.18

Waste Data by Disposal

Waste by Disposal Method (tons)	2021	2022	2023
Recovery	20,515.84	21,389.62	22,596.31
Other Disposal	471.66	2.86	0.09
Total (tons)	20,987.50	21,392.48	22,596.39

SOCIAL PERFORMANCE INDICATORS

Employees by Category

Employees by Category	Gender	2021	2022	2023
White-collar employees	Female	240	288	345
	Male	467	522	559
Blue-collar employees	Female	42	55	64
	Male	2,596	2,966	3,161
TOTAL		3,345	3,831	4,129

According to Duration of Employment

According to Duration of Employment	Gender	2021	2022	2023
Indefinite Term	Female	283	343	409
Indefinite Term	Male	3,062	3,488	3,720
Definite Term	Female	0	0	0
Definite Term	Male	0	0	0
TOTAL		3,345	3,831	4,129

Employees by Gender

Employees by Gender	Unit	2021	2022	2023
Male	Person	3,062	3,488	3,720
	Ratio	91.5%	91.0%	90.1%
Female	Person	283	343	409
	Ratio	7.8%	8.2%	9.0%
TOTAL		3,345	3,831	4,129

Employment Data (Other Groups)

Other Groups	Gender	2021	2022	2023
Disabled	Female	10	14	14
	Male	56	75	82
Total		66	89	96

Employment Data by Age

Employment Data by Age	Unit	2021	2022	2023
18-30 years old	Female	98	133	178
	Ratio	6.1%	7.1%	8.9%
	Male	1498	1743	1831
	Ratio	93.9%	92.9%	91.1%
31-40 years old	Female	129	145	163
	Ratio	10.7%	10.8%	10.9%
	Male	1072	1195	1330
	Ratio	89.3%	89.2%	89.1%
41-50 years old	Female	47	52	54
	Ratio	10.2%	10.2%	10.3%
	Male	415	460	468
	Ratio	89.8%	89.8%	89.7%
51-60 years old	Female	7	9	10
	Ratio	12.3%	11.8%	13.5%
	Male	50	67	64
	Ratio	87.7%	88.2%	86.5%
Over 60 years old	Female	0	0	0
	Ratio	0.0%	0.0%	0.0%
	Male	4	4	4
	Ratio	100.0%	100.0%	100.0%
TOTAL		3,320	3,808	4,102

Workforce in Management

By Management Category	Unit	2021	2022	2023
Senior Management*	Female	4	4	5
	Ratio	25.0%	23.5%	23.8%
	Male	12	13	16
	Ratio	75.0%	76.5%	76.2%
Mid-Level**	Female	15	16	13
	Ratio	22.4%	22.9%	18.8%
	Male	52	54	56
	Ratio	77.6%	77.1%	81.2%
Other***	Female	19	24	24
	Ratio	23.5%	28.6%	28.2%
	Male	62	60	61
	Ratio	76.5%	71.4%	71.8%
TOTAL		164	171	175

* Senior Management: Chairperson, Director. **Middle Level: Factory Manager, Group Manager, Manager. *** Other: Manager

Occupational Health and Safety

Occupational Accidents	Unit	2021	2022	2023
AFR – Accident Frequency Rate** (Number of Accidents x 1,000,000 /Total Working Hours)	Ratio	16.50	10.70	10.05
Accident Severity Rate** Days Lost x 1000 /Total Working Hours	Ratio	0.24	0.21	0.16
Occupational disease rate (ODR)** Number of Occupational Disease x 1,000,000/Working Hours	Ratio	0.00	0.00	0.00

* Norm Holding consolidated occupational health and safety data covers data from Norm Fasteners Bolts, Norm Fasteners Vida, Norm Fasteners Nuts, Norm Coating, Norm Tooling, Norm Forging, NRM Engineering, STD companies, **ILO International Labor Organization) Methodology has been used.

Employees Who Took Paternal Leave

Gender	Employees who took parental leave	2021	2022	2023
Female	Employees entitled to parental leave	15	10	9
	Employees who took parental leave	15	10	9
	Employees who returned to work after the end of parental leave	15	10	9
	Employees who returned to work after parental leave and worked for at least 12 months afterwards	14	7	8

Gender	Employees who took parental leave	2021	2022	2023
Male	Employees entitled to parental leave	196	234	215
	Employees who took parental leave	196	234	215
	Employees who returned to work after the end of parental leave	196	234	215
	Employees who returned to work after parental leave and worked for at least 12 months afterwards	166	181	166

Employee Loyalty and Satisfaction Score

Employee Loyalty and Satisfaction Score	Unit	2021	2023
Employee Loyalty	Points	71	59
Employee Satisfaction	Points	82	73

All Trainings (By Type)	Unit	2021	2022	2023
Professional Development	Hour*Person	14,110.00	18,671.75	17,999.72
Personal Development	Hour*Person	2,315.00	84.00	1,612.24
OHS	Hour*Person	25,343.00	32,604.00	42,654.00
Other	Hour*Person	30,115.00	28,944.05	37,994.23
Total Training Hours	Hour*Person	71,883.00	80,303.80	100,206.19

Environment Related Trainings		2021	2022	2023
Trainings	Hour*person	1,008.00	1,497.00	1,661.56
Trained employees	Person	699	883	1,263

All Trainings (By Type)	2021	2022	2023
Number of employees who have completed Ethics Training	1,073	416	2,055

ECONOMIC PERFORMANCE INDICATORS

Economic Value Created	Unit	2021	2022	2023
Consolidated Net Sales	Million Euros	350.1	466	499

**Norm Holding net sales excluding its oversea subsidiaries.*

Combined Investment	Unit	2021	2022	2023
Combined Investments	Million Euros	44	83	86

Twin Transformation and R&D & Innovation Investment	Unit	2021	2022	2023
Twin Transformation and R&D & Innovation Investments	Million TL	28.1	112.4	125.4

R&D Investment to Turnover Ratio	2021	2022	2023
Norm Fasteners Nuts	0.381%	0.234%	0.296%
Norm Fasteners Bolts	1.20%	1.36%	1.45%
Norm Tooling	0.7%	2.87%	3.85%

Number of R&D Employees	2021	2022	2023
Norm Fasteners Nuts R&D Center	19	19	19
Norm Fasteners Bolts R&D Center	48	51	55
Norm Tooling R&D Center	19	20	21

Number of University Cooperation	2021	2022	2023
Projects	3	4	13
Theses	10	14	8

Number of Patent applications	2021	2022	2023
Norm Fasteners Nuts	0	0	1
Norm Fasteners Bolts	2	4	6
Norm Tooling	0	0	1

Number of New Products	2021	2022	2023
Norm Fasteners Nuts	535	533	440
Norm Fasteners Bolts	2,241	2,591	1,372
Norm Tooling	0	0	1

Distribution of Payments Made to Trade Group Suppliers

	Unit	2021	2022	2023
Import Amount	%	9	11	8
Domestic Purchase Amount	%	91	89	92
Number of Oversea Suppliers	Number	62	40	37
Number of Domestic Suppliers	Number	150	155	173
Total Number of Suppliers	Number	212	195	210

Distribution of Payments Made to Industry Group Suppliers

	Unit	2021	2022	2023
Import Amount	%	47	46	37
Domestic Purchase Amount	%	53	54	63
Number of Oversea Suppliers	Number	126	160	139
Number of Domestic Suppliers	Number	1,140	1,091	1,048
Total Number of Suppliers	Number	1,266	1,251	1,187

GRI INDEX

GRI STANDARTS	Disclosure	Headline	Page Number
GRI 2: General Disclosures 2021	2-1 Organizational details	About Norm Holding	9-18
	2-2 Entities included in the organization's sustainability reporting	About Norm Holding	9-18
	2-3 Reporting period, frequency and contact point	About the Report	4
	2-4 Restatements of information	No information has been revised.	-
	2-5 External assurance	About the Report	4
	2-6 Activities, value chain and other business relationships	About the Report Norm Holding and Affiliated Companies Norm Holding Value Chain	9, 13, 31
	2-7 Employees	Diversity, Equity, and Inclusion	40-41
	2-8 Workers who are not employees	Diversity, Equity, and Inclusion	40-41
	2-9 Governance structure and composition	Board of Directors and Our Organizational Structure	20
	2-10 Nomination and selection of the highest governance body	Board of Directors and Our Organizational Structure	20
	2-11 Chair of the highest governance body	Board of Directors and Our Organizational Structure	20
	2-12 Role of the highest governance body in overseeing the management of impacts	Sustainability Management	34
	2-13 Delegation of responsibility for managing impacts	Sustainability Management	34
	2-14 Role of the highest governance body in sustainability reporting	Sustainability Management	34
	2-15 Conflicts of interest	Ethics and Compliance	26
	2-16 Communication of critical concerns	Corporate Risk Management	26
	2-17 Collective knowledge of the highest governance body	Board of Directors and Our Organizational Structure	20
	2-18 Evaluation of the performance of the highest governance body	Board of Directors and Our Organizational Structure	20
	2-19 Remuneration policies	Talent Management	41-42
	2-20 Process to determine remuneration	Talent Management	41-42
	2-21 Annual total compensation ratio	This information is not shared in accordance with the institution's privacy policy.	-
	2-22 Statement on sustainable development strategy	Sustainability Approach	32-33

GRI STANDARTS	Disclosure	Headline	Page Number
GRI 2: General Disclosures 2021	2-23 Policy commitments	https://normholding.com/en/corporate-governance-policies/	-
	2-24 Embedding policy commitments	https://normholding.com/en/corporate-governance-policies/	-
	2-25 Processes to remediate negative impacts	Corporate Management Corporate Risk Management Internal Audit Materiality Matrix Ethics and Compliance Anti-Corruption and Anti-Bribery Approach	20, 26, 27, 30
	2-26 Mechanisms for seeking advice and raising concerns	Ethics and Compliance	26
	2-27 Compliance with laws and regulations	Ethics and Compliance	26
	2-28 Membership associations	Collaborations and Initiatives	17
	2-29 Approach to stakeholder engagement	Stakeholder Engagement and Materiality Matrix	29
	2-30 Collective bargaining agreements	There is no collective agreement in place for the workforce.	-
	GRI 3: Material Topics 2021	3-1 Process to determine material topics	Stakeholder Engagement and Materiality Matrix 29-31
		3-2 List of material topics	Stakeholder Engagement and Materiality Matrix 29-31
		3-3 Management of material topics	Sustainability Approach Sustainability Strategy Sustainability Goals 32, 34, 35-38

GRI 200: Economic Standards Series	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Work Matters Economic Performance	57
	3-2 List of material topics	Work Matters Economic Performance	57
	3-3 Management of material topics	Work Matters Economic Performance	57
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Economic Performance Responsible Investments	57
	201-2 Financial implications and other risks and opportunities due to climate change	Corporate Risk Management Management of Environmental, Social and Governance (ESG) Risks	26
	201-3 Defined benefit plan obligations and other retirement plans	-	-
	201-4 Financial assistance received from government	This information is not shared in accordance with the institution's privacy policy.	-

Market Presence	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Work Matters Economic Performance R&D and Innovation	57, 52
	3-2 List of material topics	Work Matters Economic Performance R&D and Innovation	57, 52
	3-3 Management of material topics	Work Matters Economic Performance R&D and Innovation	57, 52
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	This information is not shared in accordance with the institution's privacy policy.	-
	202-2 Proportion of senior management hired from the local community	No information is held.	-

Indirect Economic Impacts	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Economic Performance Responsible Investments R&D and Innovation	57, 52
	3-2 List of material topics	Economic Performance Responsible Investments R&D and Innovation	57, 52
	3-3 Management of material topics	Economic Performance Responsible Investments R&D and Innovation	57, 52
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Economic Performance Responsible Investments R&D and Innovation	57, 52
	203-2 Significant indirect economic impacts	Economic Performance Responsible Investments R&D and Innovation	57, 52

Procurement Practices	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Sustainable Supply Chain	60
	3-2 List of material topics	Sustainable Supply Chain	60
	3-3 Management of material topics	Sustainable Supply Chain	60
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Sustainable Supply Chain	60

Anti-corruption	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Ethics and Compliance Anti-Corruption and Anti-Bribery Approach	26, 27
	3-2 List of material topics	Ethics and Compliance Anti-Corruption and Anti-Bribery Approach	26, 27
	3-3 Management of material topics	Ethics and Compliance Anti-Corruption and Anti-Bribery Approach	26, 27
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Ethics and Compliance Anti-Corruption and Anti-Bribery Approach	26, 27
	205-2 Communication and training about anti-corruption policies and procedures	Ethics and Compliance Anti-Corruption and Anti-Bribery Approach	26, 27
	205-3 Confirmed incidents of corruption and actions taken	Ethics and Compliance Anti-Corruption and Anti-Bribery Approach	26, 27

Anti-competitive Behavior	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Combating Anti-Competitive Practices	27
	3-2 List of material topics	Combating Anti-Competitive Practices	27
	3-3 Management of material topics	Combating Anti-Competitive Practices	27
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Combating Anti-Competitive Practices	27

Tax	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Tax Management	27
	3-2 List of material topics	Tax Management	27
	3-3 Management of material topics	Tax Management	27
GRI 207: Tax 2019	207-1 Approach to tax	Tax Management	27
	207-2 Tax governance, control, and risk management	Tax Management	27
	207-3 Stakeholder engagement and management of concerns related to tax	Tax Management	27
	207-4 Country-by-country reporting	Tax Management	27

GRI 300: ENVIRONMENTAL STANDARDS SERIES

Materials	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	R&D and Innovation	52-54
	3-2 List of material topics	R&D and Innovation	52-54
	3-3 Management of material topics	R&D and Innovation	52-54
GRI 301: Materials 2016	301-1 Materials used by weight or volume	R&D and Innovation	52-54
	301-2 Recycled input materials used	R&D and Innovation	52-54
	301-3 Reclaimed products and their packaging materials	R&D and Innovation	52-54

Energy	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Energy Management and Greenhouse Gas Emissions	47-48
	3-2 List of material topics	Energy Management and Greenhouse Gas Emissions	47-48
	3-3 Management of material topics	Energy Management and Greenhouse Gas Emissions	47-48
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy Management and Greenhouse Gas Emissions	47-48
	302-2 Energy consumption outside of the organization	Energy Management and Greenhouse Gas Emissions	47-48
	302-3 Energy intensity	Energy Management and Greenhouse Gas Emissions	47-48
	302-4 Reduction of energy consumption	Energy Management and Greenhouse Gas Emissions	47-48
	302-5 Reductions in energy requirements of products and services	Energy Management and Greenhouse Gas Emissions	47-48

Water	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Water Management	49
	3-2 List of material topics	Water Management	49
	3-3 Management of material topics	Water Management	49
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Water Management	49
	303-2 Management of water discharge-related impacts	Water Management	49
	303-3 Water withdrawal	Water Management	49
	303-4 Water discharge	Water Management	49
	303-5 Water consumption	Water Management	49

Biodiversity	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Materiality Matrix	30-31
	3-2 List of material topics	Materiality Matrix	30-31
	3-3 Management of material topics	Materiality Matrix	30-31
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	No information is held.	-
	304-2 Significant impacts of activities, products and services on biodiversity	No information is held.	-
	304-3 Habitats protected or restored	No information is held.	-
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	No information is held.	-

Emissions	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Energy Management and Greenhouse Gas Emissions	47-48
	3-2 List of material topics	Energy Management and Greenhouse Gas Emissions	47-48
	3-3 Management of material topics	Energy Management and Greenhouse Gas Emissions	47-48
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Energy Management and Greenhouse Gas Emissions	47-48
	305-2 Energy indirect (Scope 2) GHG emissions	Energy Management and Greenhouse Gas Emissions	47-48
	305-3 Other indirect (Scope 3) GHG emissions	Energy Management and Greenhouse Gas Emissions	47-48
	305-4 GHG emissions intensity	Energy Management and Greenhouse Gas Emissions	47-48
	305-5 Reduction of GHG emissions	Energy Management and Greenhouse Gas Emissions	47-48
	305-6 Emissions of ozone-depleting substances (ODS)	No information is held.	-
	305-6 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Waste Management and Circularity	50

Waste	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Waste Management and Circularity	50
	3-2 List of material topics	Waste Management and Circularity	50
	3-3 Management of material topics	Waste Management and Circularity	50
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Waste Management and Circularity	50
	306-2 Management of significant waste-related impacts	Waste Management and Circularity	50
	306-3 Waste generated	Waste Management and Circularity	50
	306-4 Waste diverted from disposal	Waste Management and Circularity	50
	306-5 Waste directed to disposal	Waste Management and Circularity	50

Supplier Environmental Assessment	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Sustainable Supply Chain	60
	3-2 List of material topics	Sustainable Supply Chain	60
	3-3 Management of material topics	Sustainable Supply Chain	60
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Sustainable Supply Chain	60
	308-2 Negative environmental impacts in the supply chain and actions taken	Sustainable Supply Chain	60

GRI 400: SOCIAL STANDARDS SERIES

Employment	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Diversity, Equity, and Inclusion	40-41
	3-2 List of material topics	Diversity, Equity, and Inclusion	40-41
	3-3 Management of material topics	Diversity, Equity, and Inclusion	40-41
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Diversity, Equity, and Inclusion	40-41
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Human Matters	40-41
	401-3 Parental leave	Diversity, Equity, and Inclusion	40-41

Labor/Management Relations	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Human Matters	40
	3-2 List of material topics	Human Matters	40
	3-3 Management of material topics	Human Matters	40
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	No information is held.	-

Occupational Health and Safety	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Occupational Health and Safety	44
	3-2 List of material topics	Occupational Health and Safety	44
	3-3 Management of material topics	Occupational Health and Safety	44
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Occupational Health and Safety	44
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health and Safety	44
	403-3 Occupational health services	Occupational Health and Safety	44
	403-4 Worker participation, consultation, and communication on occupational health and safety	Occupational Health and Safety	44
	403-5 Worker training on occupational health and safety	Occupational Health and Safety	44
	403-6 Promotion of worker health	Occupational Health and Safety	44
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health and Safety	44
	403-8 Workers covered by an occupational health and safety management system	Occupational Health and Safety	44
	403-9 Work-related injuries	Occupational Health and Safety	44
	403-10 Work-related ill health	Occupational Health and Safety	44

Training and Education	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Talent Management	41-43
	3-2 List of material topics	Talent Management	41-43
	3-3 Management of material topics	Talent Management	41-43
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Talent Management	41-43
	404-2 Programs for upgrading employee skills and transition assistance programs	Talent Management	41-43
	404-3 Percentage of employees receiving regular performance and career development reviews	Talent Management	41-43

Diversity and Equal Opportunity	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Diversity, Equity, and Inclusion	40
	3-2 List of material topics	Diversity, Equity, and Inclusion	40
	3-3 Management of material topics	Diversity, Equity, and Inclusion	40
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Diversity, Equity, and Inclusion	40
	405-2 Ratio of basic salary and remuneration of women to men	-	-

Non-discrimination	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Diversity, Equity, and Inclusion	40
	3-2 List of material topics	Diversity, Equity, and Inclusion	40
	3-3 Management of material topics	Diversity, Equity, and Inclusion	40
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Diversity, Equity, and Inclusion	40

Freedom of Association and Collective Bargaining	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	There is no collective agreement in place for the workforce.	-
	3-2 List of material topics	There is no collective agreement in place for the workforce.	-
	3-3 Management of material topics	There is no collective agreement in place for the workforce.	-
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	There is no collective agreement in place for the workforce.	-

Child Labor	Disclosure	Headline	Page Number
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Corporate Risk Management Sustainable Supply Chain	26, 60

Forced or Compulsory Labor	Disclosure	Headline	Page Number
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Corporate Risk Management Sustainable Supply Chain	26, 60

Security Practices	Disclosure	Headline	Page Number
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	No information is held.	-

Local Communities	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Social Contribution Responsible Investments	57, 44-45
	3-2 List of material topics	Social Contribution Responsible Investments	57, 44-45
	3-3 Management of material topics	Social Contribution Responsible Investments	57, 44-45
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Social Contribution Responsible Investments	57, 44-45
	413-2 Operations with significant actual and potential negative impacts on local communities	During the reporting period, there were no instances of negative feedback.	-

Supplier Social Assessment	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Sustainable Supply Chain	60
	3-2 List of material topics	Sustainable Supply Chain	60
	3-3 Management of material topics	Sustainable Supply Chain	60
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Sustainable Supply Chain	60
	414-2 Negative social impacts in the supply chain and actions taken	Sustainable Supply Chain	60

Customer Health and Safety	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Customer Satisfaction Product Quality and Safety	58
	3-2 List of material topics	Customer Satisfaction Product Quality and Safety	58
	3-3 Management of material topics	Customer Satisfaction Product Quality and Safety	58
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Customer Satisfaction Product Quality and Safety	58
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Customer Satisfaction Product Quality and Safety	58

Marketing and Labeling	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Customer Satisfaction Product Quality and Safety	58
	3-2 List of material topics	Customer Satisfaction Product Quality and Safety	58
	3-3 Management of material topics	Customer Satisfaction Product Quality and Safety	58
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	Customer Satisfaction Product Quality and Safety	58
	417-2 Incidents of non-compliance concerning product and service information and labeling	Customer Satisfaction Product Quality and Safety	58
	417-3 Incidents of non-compliance concerning marketing communications	Customer Satisfaction Product Quality and Safety	58

Customer Privacy	Disclosure	Headline	Page Number
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Information Security	27
	3-2 List of material topics	Information Security	27
	3-3 Management of material topics	Information Security	27
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Information Security Customer Satisfaction	27, 58



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