PEGASUS HAVA TAŞIMACILIĞI A.Ş.

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
Read full terms of disclosure

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09/16/2025, 10:40 am

Contents

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☑ English

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

Select from:

☑ TRY

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:

☑ Publicly traded organization

(1.3.3) Description of organization

Pegasus Hava Taşımacılığı A.Ş. ("Pegasus" or the "Company") is Türkiye's leading low-cost airline, with a fleet of 118 aircraft and an annual passenger volume of 37.5 million as of 2024. Since 2005, we became a leading player in the airline industry across a network of 53 countries and 146 destinations, of which 109 are international, again as of 2024. In 2024, we recorded the highest EBITDA margin across the industry with 33.3%, while at the same time we achieved similar success in terms of low unit costs (measured in non-fuel cost per available seat kilometer – CASK) at c 2.55. Our young fleet, efficient aircraft utilization, passenger numbers and passenger loyalty are vital to our lean & efficient operations, and we keep safety at the core of our business. We aim to provide passengers with an easy, consistent, and personalized travel experience via innovation, digital initiatives, ancillary services and our BolBol Loyalty Program. We thrive on an inclusive and open work environment and we empower our workforce with data, know-how and technologically advanced digital tools. We maintain the youngest aircraft fleet in Türkiye and we run one of the youngest fleets among all low-cost carriers globally. Our average fleet age was 4.5 years as of the end of 2024. In July 2012, we placed a firm order with Airbus for 75 firm order and 25 optional Airbus A320/321neo aircraft. This was the largest single aircraft order in Turkish civil aviation history at the time. In December 2017, we exercised our option for 25 additional aircraft and converted these option aircrafts to firm orders in A321neo configuration. In October 2021, we placed an order with Airbus for 6 additional A321neo aircraft, in June 2022, we placed an order with Airbus for 8 additional A321neo aircraft and in July 2023, we placed and order with Airbus for 36 additional A321neo aircraft. Consequently, the purchase order with Airbus has been amended to include 150 new aircraft, which now consists of 42 firm order A320neo aircraft and 108 firm order A321neo aircraft. Under our fleet management strategy and in addition to our existing firm aircraft

orders, we placed a new order with Boeing in December 2024 to meet our aircraft needs for 2028 and beyond, covering up to 200 B737-10 aircraft. Under this agreement, a firm order for 100 B737-10 aircraft has been placed, with deliveries expected to begin in 2028. Furthermore, an option for an additional 100 B737-10 aircraft has been secured, which can potentially be converted into firm orders in the coming years. In addition, in 2016, we became the first customer of the CFM-Leap series engine used on A320neo aircraft. Significant investment in our fleet and ongoing fleet transition brings substantial advantages in reducing fuel burn. The new generation aircraft, compared to previous generation models (Airbus A320ceo – current engine option or Boeing 737-800NG), provides up to 15-20% efficiency in fuel consumption and carbon emissions. The share of the fuel-efficient new generation Airbus neo aircraft in our fleet, in terms of total seats, reached 89% as of the end of 2024. Investment in a fuel-efficient fleet and further potential fleet efficiency and advancement opportunities will help us move towards our 2030 and 2050 targets and continue to play a vital role in the early stages of our decarbonization roadmap. We are a publicly traded entity and shares representing 41.53% of our share capital are traded on Borsa Istanbul ("BIST"). As of December 31, 2024, Esas Holding is our controlling shareholder. Established in 2000, Esas Holding is the largest family-owned investment firm in Türkiye and is backed by the first- and second-generation family members of Şevket SABANCI, one of the five founding members of H. Ö. Sabancı Holding A.Ş., a leading Turkish conglomerate. With offices in Istanbul and London, Esas invests in various asset classes globally including private equity, real estate, venture capital and public markets. As of the end of 2024, Pegasus Airlines and its consolidated subsidiaries employed 8,473 full time employees.
[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/30/2024	*Select from:* ☑ Yes	*Select from:* ☑ No

[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

111822522278

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☑ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ Yes

(1.6.2) Provide your unique identifier

Irish SE-Reg S XS2337336445

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ Yes

(1.6.2) Provide your unique identifier

Borsa İstanbul TREPEGS00016

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

Borsa Istanbul PGSUS

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

789000B1MW5PQ58A8T03

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

☑ Iraq
☑ Oman
☑ Egypt
☑ Italy
☑ Qatar
☑ Jordan
☑ Kuwait
☑ Norway
☑ Poland
☑ Serbia
☑ Bahrain
☑ Belgium
☑ Spain
☑ Cyprus
☑ France
☑ Greece
☑ Israel
☑ Sweden
☑ Turkey
☑ Albania
☑ Armenia
☑ Austria
☑ Estonia
☑ Finland

☑ Croatia
☑ Czechia
☑ Denmark
☑ Ireland
☑ Lebanon
☑ Morocco
☑ Romania
☑ Ukraine
☑ Kazakhstan
☑ Kyrgyzstan
☑ Montenegro
☑ Netherlands
☑ Switzerland
☑ United Arab Emirates
☑ Iran (Islamic Republic of)
☑ United Kingdom of Great Britain and Northern Ireland
☑ Georgia
☑ Germany
☑ Hungary
☑ Bulgaria
☑ Pakistan
☑ Portugal
☑ Slovakia
☑ Azerbaijan
☑ Saudi Arabia
☑ North Macedonia
☑ Russian Federation
☑ Republic of Moldova
☑ Bosnia & Herzegovina

(1.21) For which transport modes will you be providing data?

Select all that apply
☑ Aviation

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:
☑ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

☑ Upstream value chain

☑ Downstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

☑ All supplier tiers known have been mapped

(1.24.7) Description of mapping process and coverage

We believe that value chain mapping is essential for managing environmental risks and impacts. We consider the efficient use of shared resources and the management of stakeholder engagement and relationships to be critical for minimizing environmental risks, such as climate change, which is directly related to the aviation sector. In 2023, we conducted a comprehensive study to identify the whole of our value chain. Initially, with contributions from all our departments, we created an extensive list of stakeholders, who were then evaluated and categorized based on their activities, as well as their environmental, social, and economic impacts on our operations. Subsequently, with the review and approval of our highest level of management, our value chain mapping, encompassing both upstream and downstream value chains, was finalized and updated to include a total of 17 distinct groups. We reviewed this study in 2024. Our value chain mapping covers all our stakeholders with whom we have direct relations, defined as "Tier 1". In addition to our mapping study, we also defined a specific group of our stakeholders with high environmental impacts that were identified and prioritized for collaboration and impact monitoring.
[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

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

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☑ Not an immediate strategic priority

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

We have included the issue of plastics in our work on waste reduction. We aim to evaluate our plastic usage values in our operations and the services we provide in the coming years and carry out studies in this regard. We aim to implement alternative projects to create new options to reduce our waste generation and plastic waste.
[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

3

(2.1.4) How this time horizon is linked to strategic and/or financial planning

These timeframes have been defined in alignment with our strategic priorities and the expected progress in the implementation of sustainability initiatives. To give an example, short term may mean hours for us if we think about an urgent strategic decision that has to be made related to our flights, or we try comply to new regulations within a few years which is assessed to be short term for our business practices.

Medium-term

(2.1.1) From (years)

3

(2.1.3) To (years)

10

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Medium term usually means between 3 to 10 years in our business practices, so this time horizon is also aligned with the timeline of our other strategic decisions. Renovation of our fleet with more efficient aircraft like Airbus-Neo can be given as an example of mid-term strategic decision.

Long-term

(2.1.1) From (years)

10

(2.1.2) Is your long-term time horizon open ended?

Select from:

☑ No

(2.1.3) To (years)

30

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Long term extends beyond 10 years and covers an extended time period during which we expect new technological advances to become available and the 2050 Net Zero pathway will roll-out.
[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from:	*Select from:*

	Process in place	Dependencies and/or impacts evaluated in this process
	☑ Yes	☑ Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

☑ Water

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Not location specific

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ WRI Aqueduct

International methodologies and standards

☑ IPCC Climate Change Projections

☑ ISO 14001 Environmental Management Standard

☑ Other international methodologies and standards, please specify :International Energy Agency

Other

☑ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Drought
☑ Tornado
☑ Wildfires
☑ Heat waves
☑ Cold wave/frost
☑ Pollution incident
☑ Cyclones, hurricanes, typhoons
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Storm (including blizzards, dust, and sandstorms)

Chronic physical

☑ Heat stress
☑ Water stress
☑ Sea level rise
☑ Temperature variability
☑ Precipitation or hydrological variability
☑ Increased severity of extreme weather events
☑ Changing temperature (air, freshwater, marine water)
☑ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy

☑ Carbon pricing mechanisms
☑ Changes to national legislation
☑ Poor coordination between regulatory bodies
☑ Poor enforcement of environmental regulation
☑ Increased difficulty in obtaining operations permits
☑ Changes to international law and bilateral agreements
☑ Lack of mature certification and sustainability standards
☑ Mandatory water efficiency, conservation, recycling, or process standards

Market

☑ Availability and/or increased cost of certified sustainable material
☑ Availability and/or increased cost of raw materials
☑ Changing customer behavior
☑ Uncertainty in the market signals

Reputation

☑ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

Technology

☑ Transition to lower emissions technology and products

☑ Transition to water efficient and low water intensity technologies and products

☑ Transition to water intensive, low carbon energy sources

Liability

☑ Exposure to litigation

☑ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Customers

☑ Employees

☑ Investors

☑ Regulators

☑ Suppliers

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

We have a risk management process that is integrated into our multi-disciplinary company-wide risk identification, assessment & management processes. In the risk assessment we cover all value chain stages including risks related to our supply chain & risks related to our customers (behavioral change, reputation etc.). We cover all time horizons depending on the risk type, i.e regulatory risks may be covered for short-medium term assessments, whereas physical climate related risks are covered for long-term. In parallel with risk assessment and control, the Sustainability and Environment Department also conducts dependencies and impact analysis. Dependencies and impact analysis are linked to risk and opportunity assessment. Aviation is a sector that is directly affected by climate changes and weather conditions within the scope of the area it serves. We take into account the risks, dependencies and impacts of weather conditions in both our short and medium term assessments. Identification of risks, dependencies, impacts and opportunities: Both at the company and asset level climate-change related risks, dependencies, impacts and opportunities are first identified, depending on the subject matter, by the Sustainability and Environment Department. Assessment of identified risks, dependencies, impacts and opportunities: The environment related risk assessment is performed in accordance with PG-HA-PR-013 “Corporate Risk/Opportunity

Management Procedure". The risks that are assessed to have impact on the Company by the Sustainability Department Manager or Chief Sustainability Officer are reported to the Corporate Risk & Insurance Leader in order to be included in the company-wide risk assessment process. This process includes a thorough impact & vulnerability assessment in the Risk Review Board (RRB) Meetings, that brings together the Company's senior executive management team. The risks on our corporate risk ledger where reporting thresholds are breached in the reporting period or where management assesses an increase in the risk trend, are reported to our Risk Committee (RC), which consists of non-executive members of our BoD & non-Board member, non-executive experts. The RRB and the RC meet quarterly to assess & define how to manage the risks that are identified by the relevant departments. Risk Management Reporting takes place once every two months. The Company's sustainability risk & opportunity framework, covering environment and climate change related aspects, impacts and dependencies is also evaluated on an annual basis at the RRB and the RC. Risk response: Sustainability and Environment Department is responsible for application of the management plan for environmental risks, which includes setting targets to reduce these risks & making performance reviews to assess whether the climate change related targets are met and and whether there are any incompatibility or direct/indirect impacts as an environmental aspect. For Moderate & Minor Risks the management plans are developed & applied by the Sustainability department with the approval of Chief Sustainability Officer. Sustainability&Environment Team carries out the processes of assessing opportunities, dependencies and impacts and monitoring them according to performance. The risks are assessed in four categories, namely: Human, Financial, Environmental & Reputational Risk. Further details of how risk management assessed can be seen under 2.2.7.
[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

☑ Yes

(2.2.7.2) Description of how interconnections are assessed

Conducting operational processes in the aviation sector and evaluating the impact of these processes are important within the scope of sustainable business approach. There are areas such as weather conditions, noise control, water management where we are both affected and impacted. With the understanding of operational continuity and sustainability, we include the impact areas we have identified in our field of work in our risk assessment and ensure that they are reviewed up-to-date and their possible outcomes are evaluated. As a sector, we have a structure that is directly affected by weather conditions and therefore assess weather conditions within the scope of acute/chronic categorized risk. According to climate change related scenarios, the frequency & severity of extreme weather events will become higher. These types of extreme weather events may become more frequent in the not-so-distant future which will result in disruption of our operations and potentially cause damage on our aircraft fleet and facilities. We maintain these dependencies, which are handled within the scope of weather conditions, in an integrated manner with risk management and take action in parallel at the end of the evaluation. Water use is considered as a factor that indirectly affects our operational processes. In our water management approach, we use the WRI Aqueduct water risk atlas to control our water use and assess our water supply risk. We evaluate the areas with water risk in our operational regions and identify areas where we can take precautions.
[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we are currently in the process of identifying priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☑ Direct operations

(2.3.3) Types of priority locations identified

Locations with substantive dependencies, impacts, risks, and/or opportunities

☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to water

☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to biodiversity

(2.3.4) Description of process to identify priority locations

As part of our risk assessment processes, we assess the criticality of various areas based on our provision of services across multiple locations. Our evaluation encompasses risks, dependencies, and potential impact values related to supply and procurement, tailored to the specific regions and services provided. In conjunction with our risk assessments, we categorize our supplier network according to their priority and significance to our operations. We are also focused on improving our approach to evaluating risks and opportunities on a location-specific and service-specific basis. An additional criterion we are working to incorporate into our materiality assessments includes a location-based evaluation, alongside existing criteria such as impact, commitment, substitution, environmental impact, and sustainability. Given our extensive service coverage across various locations, we do not yet possess a comprehensive assessment map for all regions. We are actively developing this map in alignment with the services rendered and supplier criteria. Additionally, we are evaluating the regions we serve through risk and opportunity studies related to water resources. Utilizing the WRI Aqueduct tool, we are identifying areas within risk zones and developing a corresponding roadmap to address these water-related risks. In the assessment conducted using the WRI Aqueduct system, we evaluate the risk of water scarcity in the regions where our operations are located. We prioritize areas classified as having high and extremely high levels of water scarcity.

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☑ No, we have a list/geospatial map of priority locations, but we will not be disclosing it

[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ Direct operating costs

(2.4.3) Change to indicator

Select from:

☑ Absolute increase

(2.4.5) Absolute increase/ decrease figure

70400000

(2.4.6) Metrics considered in definition

Select all that apply

☑ Likelihood of effect occurring

(2.4.7) Application of definition

The impact of the risk is assessed in four categories: Human, Financial, Reputation and Environment. Definition of substantive impact of a risk, therefore, changes according to the category as follows: •Human: A reportable disability, • Financial: an impact of 70.4 million TL (2 million Euros), • Reputation: National exposure • Environment: High but reversible environmental damage If the impact of a risk is assessed to be higher than the above given thresholds, even if its probability of occurance is low, the risk is considered as a substantive risk and mitigation activities are planned. For risks with lower impact we use a risk matrix to assess the probability and impact of the risks as follows: First, the probability of occurrence of the identified risk is scored as given below: o Almost Certain - 5 o Probable - 4 o Rare- 3 o Extremely Improbable - 2 o Almost impossible - 1 Then, the impact of the identified risk event is determined. Out of 4 categories (Human, Financial, Reputation and Environment), the one with the highest impact contributes to the assessment. In other words, the weakest link philosophy is used: o Critical - A o Serious- B o Moderate - C oMinor - D o Negligible -E To obtain an overall assessment of the risk, probability & severity tables are combined into a risk assessment matrix. For example, a risk probability has been assessed as rare (3). The risk severity has been assessed as Serious (B). The composite of probability & severity (3B) is the risk of a harm under consideration. The color coding in the matrix reflects the tolerability regions. o Red – 4A, 5A, 5B - Not Acceptable with current conditions, requires immediate action o Orange – 3A, 4B, 5C - High Risk: Mitigation measures shall be applied very quickly o Yellow – 2A, 2B, 3B, 3C, 4C, 4D, 5D – Critical Risk: The risk level shall be reduced. Mitigation measures shall be applied mid-term. o Green – All the rest – Acceptable risk shall be controlled regularly

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ Revenue

(2.4.3) Change to indicator

Select from:

☑ Absolute increase

(2.4.5) Absolute increase/ decrease figure

70400000

(2.4.6) Metrics considered in definition

Select all that apply

☑ Time horizon over which the effect occurs

(2.4.7) Application of definition

We treat substantial opportunities with the same level of scrutiny as risks. Many of the risks we categorize are, in fact, viewed as potential opportunities. In our evaluation process, we consider risks across four key areas: human, financial, reputational, and environmental. By adopting a reverse perspective, we assess the gains or potential gains within these areas as opportunities. We employ a threshold matrix, analogous to our risk matrix, to determine the return and significance of these opportunities. This matrix enables us to assess both the probability and impact of opportunities, thereby establishing their importance and priority levels. During the risk assessment process, opportunities identified are to be addressed by creating actions through the QDMS Action Module. The feasibility of implementing these identified opportunities is then evaluated by the relevant process owner. This evaluation and tracking are managed through the QDMS platform.
[Add row]

(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

(2.5.1) Identification and classification of potential water pollutants

Select from:

☑ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

Description of Pollutants: If de-icing fluids, fuel, oil and other chemicals used in airport operations are not controlled, they pose a risk of polluting nearby water bodies and affecting aquatic ecosystems/quality. In addition, Improper disposal of waste from aircraft and airport facilities can lead to water pollution.
Policies&Processes&Standards (A description of the metrics and/or indicators used to identify pollutants): We manage all substances that will affect the water ecosystem in accordance with the requirements of the national "Waste Management Regulation" and within the scope of hazardous substance classification. Our organization employs an Environmental Management System (EMS) to identify and classify potential water pollutants. Within the scope of ISO 14001 and our waste management system, we properly implement the necessary conditions for the use and storage of substances with the risk of pollution. We enforce strict protocols for storing, handling, and disposing of hazardous materials. Spill prevention and response plans are in place, and staff are trained on pollution prevention. In order to prevent contact of our hazardous waste storage areas with soil and water and to prevent any risk of leakage, grids and collector pallets connected to the blind well are used. Storage areas are surrounded with absorbent cloth and preventive kits.

[Fixed row]

(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Row 1

(2.5.1.1) Water pollutant category

Select from:

☑ Oil

(2.5.1.2) Description of water pollutant and potential impacts

Motor oil and fuel oil are considered within the scope of the specified oil pollutant: Spilled oil can enter sewage and water systems, causing technical problems and lengthy treatment processes in treatment plants. If it reaches natural water sources, it can harm the aquatic ecosystem, create a layer that will disrupt the water structure. Oil forms a thin layer on the water surface, blocking sunlight and reducing oxygen exchange, which affects photosynthesis in aquatic plants and oxygen levels in the water. Fuel oil is a pollutant parameter that threatens the natural aquatic ecosystem with the possibility of indirect contamination. It is therefore important to adopt proactive approaches and put in place the necessary procedures to prevent the potential for contamination.

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

☑ Downstream value chain

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☑ Implementation of integrated solid waste management systems

☑ Industrial and chemical accidents prevention, preparedness, and response

☑ Requirement for suppliers to comply with regulatory requirements

☑ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements

(2.5.1.5) Please explain

Description of how the procedures selected manage the risks of potential impacts: We prevent pollutant parameters from entering water or soil by performing solid waste storage standards in accordance with national laws. We have established an emergency policy against environmental accidents and liquid spills/leaks. We train our waste managers and conduct field audits to quickly resolve situations that may cause environmental pollution and to take correct measures. We include a clause in the main contract we sign with all our suppliers to ensure that the regulatory requirements are met. We carry out studies to take measures by evaluating the working methods and environmental impacts of our suppliers as well as our own processes. Description of how success is measured and evaluated: The main measure of success number of oil spill incidents. If there are no incidents, the management procedures are deemed to be successful. In 2024, there were no environmental accidents. In addition, no oil or any pollutant parameter was released into the environment (such as water or soil).
[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☑ Yes, both in direct operations and upstream/downstream value chain

Water

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

We do not have water-intensive processes in terms of water use, water output or volumes processed. We only use water from 3rd parties and our discharge is also made to 3rd parties. Therefore, water risks do not have a substantial effect on our organization. However; we monitor and report our direct operations water consumption and water use. We do not foresee a major change in our water use processes in the coming years, but subject to increasing volumes, we consider water as a scope with potentially higher future impact on our operations.

Plastics

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

We are a service provider, and plastics do not constitute an important part of our business processes. We are mainly end-user of the assets (e.g., aircraft) we use to deliver our services, and we acquire or dispose of aircraft from manufacturers/lessors to lessors/other aircraft operators, with no material impact on the lifecycle of plastics used in the production of the said assets. In terms of operations, main single-use plastic consumption is covered by in-flight catering. As a low-cost carrier, we do not offer standard in-flight catering to all our passengers, rendering our exposure to single-use plastic waste fairly lower than the industry averages. The remaining plastics use relate to overhead expenses for employees. Therefore, plastics-related risks do not have a substantial effect on our organization. However; we implement certain measures to avoid single-use plastics in our operations and to prevent their disposal outside recycling. We do not foresee a major change in our plastics use processes in the coming years, but subject to increasing volumes, we consider plastics as a scope with potentially higher future impact on our operations. [Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Technology

☑ Transition to lower emissions technology and products

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Italy
☑ Malta
☑ Spain
☑ France
☑ Greece
☑ Austria
☑ Belgium
☑ Croatia
☑ Czechia
☑ Denmark
☑ Romania
☑ Bulgaria
☑ Portugal
☑ Slovakia
☑ Slovenia
☑ Latvia
☑ Norway
☑ Poland
☑ Sweden
☑ Turkey
☑ Estonia
☑ Finland
☑ Germany
☑ Hungary
☑ Ireland
☑ Lithuania
☑ Luxembourg
☑ Netherlands

(3.1.1.9) Organization-specific description of risk

2024-2026 (First Phase), CORSIA applies to international flights between city-pairs covered by the states adhering to CORSIA. We monitor and report our CORSIA emissions and will be subject to offsetting (First Phase). Under ReFuelEU, starting from 2025, we will be required to procure fuel with 2% SAF blends for our flights departing from EU airports. The additional costs triggered by these obligations, kickingoff with relatively low volumes, are expected to increase in the following years and add to our operating costs.To a limited extent, we are also subject to the EU ETS for our intra-EU (EEA) flights, and we report our GHG under EU ETS. The EU has announced that it will review the implementation of CORSIA at the end of 2026, and will reassess the scope of implementation of EU ETS. Jet fuel burn accounts for almost the entire Scope 1 & 2 emissions in civil aviation, and more than ¾ of all three scope of greenhouse gas emissions. The industry's climate adaptation cannot be achieved in the short term, and requires a long-term energy transition that is heavily reliant on planning, technologic research and development, and new energy investments. Achieving compliance with CORSIA-SAF regulations, while simultaneously facing climate-related financial effect, poses a significant challenge for the aviation sector. Given the limited availability of alternatives to critical products and systems, this creates a potential risk in terms of both climate transition and emission reduction.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ High

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The additional costs triggered by these obligations, kickingoff with relatively low volumes, are expected to increase in the following years and add to our operating costs. While the risk is expected to have an impact on both short, medium and long term, its three-year short-term impact is estimated to be between USD 30-40 million. We expect the financial impact of this risk to increase in the medium and long term. However; for both medium and long term, a financial projection cannot be presented under high uncertainty due to lack of an established market for SAF or CORSIA credits.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

1056699000

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

1408932000

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

1056699000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

1408932000

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

1056699000

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

1408932000

(3.1.1.25) Explanation of financial effect figure

Approximately USD 3 million from this amount relates to our expected CORSIA offsetting requirements for the year 2024, as part of CORSIA Phase I that covers 2024-2026. On the other hand, SAF is currently procured at 2.5 times or more of the cost of jet fuel, which represents approximately one-third of the airlines' total costs, and the premium it involves creates a significant cost increase risk in the long term. We expect the financial impact of this risk to increase in the medium and long term. However; for both medium and long term a financial projection cannot be presented under high uncertainty due to lack of an established market for SAF or CORSIA credits. Therefore, financial values for the medium and long term are stated as the same as for the short term. The specified risk value represents the additional SAF cost (under the scope of the Refuel mandate) and the CORSIA credit cost estimated for the short-term period (3 years). The USD/TRY exchange rate has been used to calculate the Turkish Lira equivalents, with a low-risk value of 30 million and a high-risk value of 40 million USD.

(3.1.1.26) Primary response to risk

Policies and plans

☑ Develop a climate transition plan

(3.1.1.27) Cost of response to risk

32640736341

(3.1.1.28) Explanation of cost calculation

In 2024, we took delivery of 16 A321neo aircraft and phased-out 2 B737-800 older generation aircraft and 1 A320ceo older generation aircraft from our fleet. In 2025, we are scheduled to take delivery of another 9 A321neo aircraft. The given cost of response value indicates the cost of the aircraft joining our fleet for the year 2024. While the cost to realize risk is shown higher than the financial impact of the risk, the investment in new generation and more efficient aircraft is expected to break-even and contribute to a positive in the long run as it will help us manage more than one risk. Effective fleet transformation and a clear explanation of the associated costs are essential for managing transition risks and enhancing energy efficiency in line with net-zero roadmap.

(3.1.1.29) Description of response

We see climate change adaptation cost impact on profitability and cash flows as the most important climate-related transition risk the industry should address. While ensuring adaptation, the airlines must operate an economically sustainable business. In 2024, we published our Climate Transition Roadmap, developed in sync with our business model. In this direction, starting from 2025 we set net carbon emission&emission intensity targets in our annual budgets and we monitor the financial impact of our environmental performance.The persistent focus on low unit costs, strong cash position&financial resilience, which have been the blueprint of our low-cost business model provides us with an advantage on this challenge compared to our competitors. While we reduce our total carbon emissions footprint and the associated costs through our investment in next generation aircraft and operational efficiency initiatives, we also carry out work to better manage the cost associated risks triggered by SAF&CORSIA requirements. In 2024, we completed our first purchase of REDD+ARTTrees credits that are eligible emissions units under CORSIA, as part of Phase I. We regularly monitor our annual SAF and CORSIA-related risks.Also, being a important keystone for our transition roadmap, since 2016 we have been transforming our fleet with next generation aircraft comprising Airbus A320neo-A321neo. As of the end of 2024, with an average aircraft age of 4.5 we operated one of the youngest aircraft fleet globally(with 118 aircraft).Neo denominates "new engine option" referring to new generation engines with less unit fuel consumption-

thereby producing less CO2. Our priority for economically&environmentally sustaining our services is to operate as efficiently as possible. By implementing a fleet renewal plan and operating a young and highly-efficient aircraft fleet, we are able to manage our exposure to climate change risk while increasing our efficiency. [Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

☑ OPEX

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

1408932000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☑ 1-10%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☑ Less than 1%

(3.1.2.7) Explanation of financial figures

Approach used for calculation: The risk value indicated is expressed as a value for transition risk. Therefore, the highest value in the specified range can be expressed as vulnerable and open in our transition stage financial approach. The method used to calculate the value with this approach: 3.1.1 Climate transition risk with the highest specified value (maximum) / Total OPEX
[Add row]

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations	Comment
	Select from: ☑ No	*No regulatory violations on water in 2024*

[Fixed row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:
☑ Yes

(3.5.1) Select the carbon pricing regulation(s) which impact your operations.

Select all that apply
☑ EU ETS
☑ UK ETS

(3.5.2) Provide details of each Emissions Trading Scheme (ETS) your organization is regulated by.

EU ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

0.01

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

12/31/2023

(3.5.2.4) Period end date

12/30/2024

(3.5.2.5) Allowances allocated

2807

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

219

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☑ Facilities we own and operate

(3.5.2.10) Comment

In EU-ETS we are only responsible for the emissions of our intra-EU flights (intra-EEA flights). The % of Scope 1 emissions covered by EU-ETS is 0.006%, as CDP's online response system only allows 2 decimal digits this value is rounded up to 0.01%. In 2024 we have surrendered 219 tons of our allocated GHG emissions under EU-ETS.

UK ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

0.01

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

12/31/2023

(3.5.2.4) Period end date

12/30/2024

(3.5.2.5) Allowances allocated

30

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

25

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☑ Facilities we own and operate

(3.5.2.10) Comment

In UK-ETS we are only responsible for the emissions of our intra-UK flights. The % of Scope 1 emissions covered by UK-ETS is 0.0007%, as CDP's online response system only allows 2 decimal digits this value is rounded up to 0.01%. In 2024 we have surrendered 25 tons of our allocated GHG emissions under UK-ETS.
[Fixed row]

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

We monitor our GHG emissions related to our intra-EU flights (intra-EEA flights) since aviation's inclusion in the EU-ETS. Intra-EU (intra-EEA) flights make up a very small portion of our operations, therefore we are always below our emission cap. A similar monitoring is underway for our GHG emissions relating to our flights within the scope of UK ETS since its launch. Like EU-ETS, UK-ETS is an unlikely scope for us as we do not have any commercial flights falling within its scope; we would only be captured for exceptional positioning or maintenance-related flights. Our flights in CH (Swiss) ETS area are monitored and reported in the same way as EU and UK ETS. As a result of the agreements between EU and CH ETS authorities, CH ETS is reported under EU ETS and separated by the external authority to which we are affiliated. Since we are considered as a small emitter under EU, UK and CH ETS, our reporting to the international authority is considered valid for reporting and verification steps. The flights we operate are recorded in our corporate emissions monitoring system. These can be filtered through origin and destination, depending on the applicable scheme for which monitoring is carried-out. We can also trace all leased-in and leased-out operations and these are recorded separately in the system. Our Cost Control Department is responsible for cross checking on a monthly basis whether our flights that have been invoiced by Eurocontrol are recorded on our Revenue and Cost Accounting system, also cross-checking our route reports with Technic Department on technical logs. Sustainability and Environment Department is responsible for sample checks of the performance (number of flights, kilometers flown, maintenance, etc.) of aircraft in Pegasus Airlines fleet. Any inconsistency in available data is tracked down with the help of performance controls. In addition, we closely follow the developments related to systems that we must comply with. We measure and assess the impacts of the system amendments before entering into force and take the necessary steps strategically. In 2024, we reported EU ETS report as 219 tCO2. We reported UK ETS report as 25 tCO2.

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

☑ Yes, we have identified opportunities, and some/all are being realized

Water

(3.6.1) Environmental opportunities identified

Select from:

☑ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☑ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

We do not have water-intensive processes in terms of water use, water output or volumes processed. We only use water from 3rd parties and our discharge is also made to 3rd parties. Therefore, water risks do not have a substantial effect on our organization. However; we monitor and report our direct operations water consumption and water use. We do not foresee a major change in our water use processes in the coming years, but subject to increasing volumes, we consider water as a scope with potentially higher future impact on our operations.
[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☑ Use of low-carbon energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Iraq
☑ Oman
☑ Egypt
☑ Italy
☑ Qatar
☑ Kuwait
☑ Norway
☑ Poland
☑ Serbia
☑ Sweden
☑ Belgium
☑ Croatia
☑ Czechia
☑ Denmark
☑ Estonia
☑ Spain
☑ France
☑ Greece
☑ Israel
☑ Jordan
☑ Turkey
☑ Albania
☑ Armenia
☑ Austria
☑ Bahrain
☑ Finland
☑ Georgia
☑ Germany
☑ Hungary
☑ Ireland

☑ Lebanon
☑ Morocco
☑ Romania
☑ Ukraine
☑ Bulgaria
☑ Kyrgyzstan
☑ Montenegro
☑ Netherlands
☑ Switzerland
☑ Saudi Arabia
☑ Iran (Islamic Republic of)
☑ United Kingdom of Great Britain and Northern Ireland
☑ Pakistan
☑ Portugal
☑ Slovakia
☑ Azerbaijan
☑ Kazakhstan
☑ North Macedonia
☑ Russian Federation
☑ Republic of Moldova
☑ Bosnia & Herzegovina
☑ United Arab Emirates

(3.6.1.8) Organization specific description

Being a low-cost carrier, with a high focus on cost management, we are conscious about reducing our fuel consumption. Climate-related concerns emphasize the importance of reduction in fossil fuel consumption. These factors drive us to invest in new technologies to increase our fuel efficiency. We are at an advanced stage of transforming our fleet with new generation/fuel efficient Airbusneo aircraft, and we also focus on extending our seat capacity with optimum efficiency through growth in our fleet. A321neos provide us with approximately 53 additional seats in our configuration compared to the other aircraft in our fleet. Airbus thus provides us the opportunity to increase our production capacity while reducing our emissions intensity. Our fleet transformation with younger/efficient aircraft type is an integral part of our sustainability strategy. The engine found on neo aircraft (LEAP-1A) is a high bypass ratio engine(11:1 ratio). The bypass ratio of the CFM56-5B engine on our older Airbusceo aircraft or the CFM56-7B engine on the B737-800 is around 5:1-6:1. A321neo aircraft combines this with the additional benefit of about 30% higher passenger capacity. Realizing this opportunity will increase our revenues due to the increase in our seat capacity, as new and more efficient aircraft also have the capacity to carry more passengers than the older versions with savings in unit fuel consumption. This provides us to manage the emissions exposure resulting from our fleet growth.

(3.6.1.9) Primary financial effect of the opportunity

Select from:
☑ Increased revenues resulting from increased production capacity

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term
☑ Medium-term
☑ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:
☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:
☑ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

By implementing our fleet transformation into new aircraft, especially focusing on A321neo (and Boeing 737 Max starting from 2028) with higher seat capacity, we will be able to increase our revenues while reducing our GHG emission intensity. In line with the Pegasus Airlines' strategy, in 2024, 16 new additional A321neo aircraft joined our fleet and the share of A321neo aircraft in our fleet reached 48.3% at the end of 2023 (Total neo representation: 89% of all our seat capacity – A320neo and A321neo).

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:
☑ Yes

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

3191230980

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

3191230980

(3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

3191230980

(3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

3191230980

(3.6.1.21) Anticipated financial effect figure in the long-term - minimum (currency)

3191230980

(3.6.1.22) Anticipated financial effect figure in the long-term – maximum (currency)

3191230980

(3.6.1.23) Explanation of financial effect figures

In 2024, the fuel efficiency performance of our next generation aircraft helped us avoid the consumption of 96,000 tons of jet fuel that would have been consumed if the same flights were carried out by older generation aircraft. Considering the prevailing fuel price and the USD 22 CORSIA eligible emissions unit cost at the end of 2024, the said savings in fuel consumption corresponds to a cost reduction of approximately TRY 3,191,230,980 (90.6 million USD). Since the calculated opportunity value is based on an efficiency analysis between older-generation and new-generation aircraft, it provides more concrete data point; therefore, the maximum and minimum risk values have been entered as equal.Although changes in the scope of next-generation aircraft can be anticipated in the medium term, price approaches and efficiency analyses for the long term cannot be shared due to uncertainty percentages. Therefore, financial values for the medium and long term are stated as the same as for the short term.

(3.6.1.24) Cost to realize opportunity

32640736341

(3.6.1.25) Explanation of cost calculation

The given cost of response value indicates the cost of the aircraft joining our fleet for the year 2024. While the cost to realize opportunity is shown higher than the financial impact of the opportunity, the investment in new generation and more efficient aircraft is expected to break even and contribute to a positive in the long run as it will help us manage more than one opportunity along with several risks.

(3.6.1.26) Strategy to realize opportunity

Pegasus Airlines is strategically focusing on expanding its fleet with Airbus neo aircraft, particularly A321neo aircraft (and Boeing 737 Max starting from 2028), which has a higher seat capacity (+53), providing important unit fuel consumption advantage. In 2024, 16 A321neo aircraft were joined our fleet & 9 additional A321neo aircraft will join in our fleet (planned) until the end of 2025. New aircraft reduces unit fuel consumption by up to 20% compared to the previous generation counterparts, while emitting less CO2. At end of 2024, our fleet consisted of 9 Boeing 737-800, 6 Airbus 320ceo, 46 Airbus 320neo and 57 Airbus 321neo aircraft. As a result of new A321neo aircraft joining our fleet, our seat capacity increased approximately by 14% in 2024 compared to 2023. In 2024, our "Scheduled flight and service revenue" increased by approximately 58.5%. Inclusion of 16 A321neo aircraft in our fleet contributed significantly to this increase. Taking the same number of flights, higher number of passengers are carried on Airbus A321neo aircraft with comparable unit fuel consumption. The financial figures/cost ranges presented here are for illustrative purposes only and should not be taken as accurate projections of future financial exposure. The values have been calculated to explain the cost range based on the described, non-adopted approach. As of the end of 2024, Airbus 320/321neo aircraft constitute 89% of the total seat capacity available in our fleet. As of the end of 2024, as part of our existing aircraft orders with Airbus and Boeing, we have more than 150 firm order neo and 737-10 aircraft to be delivered. Our continuous investment in the new aircraft provides us with an advantage in terms of fuel efficiency. In 2024, the fuel efficiency performance of our next generation aircraft helped us avoid the consumption of 96,000 tons of jet fuel that would have been consumed if the same flights were carried out by older generation aircraft.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☑ Stronger competitive advantage

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Iraq

☑ Oman

☑ Spain

☑ France

☑ Egypt
☑ Italy
☑ Qatar
☑ Kuwait
☑ Norway
☑ Poland
☑ Serbia
☑ Sweden
☑ Belgium
☑ Croatia
☑ Czechia
☑ Denmark
☑ Estonia
☑ Lebanon
☑ Morocco
☑ Romania
☑ Ukraine
☑ Bulgaria
☑ Kyrgyzstan
☑ Montenegro
☑ Netherlands
☑ Switzerland
☑ Saudi Arabia
☑ Iran (Islamic Republic of)
☑ United Kingdom of Great Britain and Northern Ireland
☑ Greece
☑ Israel
☑ Jordan
☑ Turkey
☑ Albania
☑ Armenia
☑ Austria
☑ Bahrain
☑ Finland
☑ Georgia
☑ Germany
☑ Hungary
☑ Ireland
☑ Pakistan
☑ Portugal
☑ Slovakia
☑ Azerbaijan
☑ Kazakhstan
☑ North Macedonia
☑ Russian Federation
☑ Republic of Moldova
☑ Bosnia & Herzegovina
☑ United Arab Emirates

(3.6.1.8) Organization specific description

Emissions related costs occur largely as a result of jet fuel consumption, which increases parallel to the volume of operations, rendering the impact of fuel and operational efficiency initiatives on financial performance more important every day. The low-cost carrier business model prioritizes lean and efficient processes. This approach helps reduce consumption in all business processes and fosters new practices that improve the management of environmental impact.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☑ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

One initiative that stood out among others in 2024 was our implementation of the SkyBreathe eco-flight platform. SkyBreathe helps us better monitor our flights, analyze various fuel-efficiency opportunities and identify rooms for further improvement. We aim to fully implement this tool starting from 2025. Considering the prevailing fuel price and the USD 22 CORSIA eligible emissions unit cost at the end of 2024, 2% achievement of fuel savings through the use of this tool will correspond to a cost reduction of approximately USD 20 million. This would have a direct positive impact on operating cash flows, reduce exposure to carbon compliance costs, and further strengthen our financial position over the medium term. The adoption of fuel-efficiency technologies and our ongoing commitment to cost discipline are expected to generate measurable financial benefits in the short to medium term, while enhancing our resilience and transition capacity in the face of evolving climate-related risks and regulatory pressures.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ Yes

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

704466000

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

704466000

(3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

704466000

(3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

704466000

(3.6.1.21) Anticipated financial effect figure in the long-term - minimum (currency)

704466000

(3.6.1.22) Anticipated financial effect figure in the long-term – maximum (currency)

704466000

(3.6.1.23) Explanation of financial effect figures

The persistent focus on low unit costs, strong cash position and financial resilience, which have been the blueprint of our low-cost business model provides us with an advantage on climate change adaptation compared to our competitors. In 2024, we achieved the second-lowest unit emissions (grCO2/RPK) across the industry. Additionally, we sustain our strong operational profitability (EBITDA %) and unit cost (CASK, non-fuel) performance in 2019 and post-COVID in 2022-2023-2024, which strongly supports our longer-term sustainability and climate transition capacity. One initiative that stood out among others in 2024 was our implementation of the SkyBreathe eco-flight platform. SkyBreathe helps us better monitor our flights, analyze various fuel-efficiency opportunities and identify rooms for further improvement. We aim to fully implement this tool starting from 2025. Considering the prevailing fuel price and the USD 22 CORSIA eligible emissions unit cost at the end of 2024, 2% achievement of fuel savings through the use of this tool will correspond to a cost reduction of approximately TRY 704,466,000 (USD 20 million). Since the calculated opportunity value is based on an efficiency analysis, it provides more concrete data point; therefore, the maximum and minimum risk values have

been entered as equal. Although changes in the scope of next-generation aircraft can be anticipated in the medium term, price approaches and efficiency analyses for the long term cannot be shared due to uncertainty percentages. Therefore, financial values for the medium and long term are stated as the same as for the short term.

(3.6.1.24) Cost to realize opportunity

10566990

(3.6.1.25) Explanation of cost calculation

Our cost calculation is based on a low-cost business model that prioritizes lean and efficient operational management. We maintain a fleet operating with high efficiency and minimal waste, thereby ensuring a low unit cost base. This is achieved through rigorous control mechanisms led by our Cost Control and Analysis Team, which continuously monitors and manages costs in coordination with operational teams and support functions. The cost structure reflects various operational initiatives that challenge traditional practices, resulting in significant efficiency gains and cost reductions. Within the scope of cost calculation, investments and operational expenses related to various efficiency projects are also taken into account. These development costs are carefully calculated and evaluated to ensure that all expenditures associated with improvements are appropriately incorporated into the overall cost structure.

(3.6.1.26) Strategy to realize opportunity

Our strategy to realize operational and financial opportunities revolves around maintaining lean and efficient operations supported by strong leadership from our Board of Directors and management. We implement coordinated operational initiatives driven by our commitment to becoming a Digital Airline and achieving environmental goals. These initiatives leverage digital tools and innovative practices to optimize resource use, reduce costs, and enhance sustainability. The synergy between operational teams, cost control, and support functions enables us to consistently break the mold of conventional approaches, unlocking significant efficiency improvements and cost savings.
[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:
☑ Revenue

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

3191230980

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ 1-10%

(3.6.2.4) Explanation of financial figures

The stated opportunity value refers to the revenue generated by an investment that serves a positive environmental outcome. Therefore, the highest value in the specified range is considered to be in line with our financial approach defined for the opportunity. The method used to calculate the value with this approach: 3.6.1 Opportunity with the highest stated value (maximum) / Total Revenue.
[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ Quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

Pegasus Airlines Policy on Representation in the Board of Directors aims to increase female representation at the Board of Directors to a minimum of 25% by 2025, in line with the Company's commitment to IATA's 25by2025 initiative. The policy was first adopted in 2014, amended in 2019 to incorporate the 25% minimum target. Since September 2022, Pegasus Airlines meets the minimum target stipulated in this policy.

(4.1.6) Attach the policy (optional)

pegasus-policy-on-representation-in-the-board-of-directors.pdf
[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

Climate change

(4.1.1.1) Board-level oversight of this environmental issue

Select from:
☑ Yes

Water

(4.1.1.1) Board-level oversight of this environmental issue

Select from:
☑ No, but we plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:
☑ Not an immediate strategic priority

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

We do not have water-intensive processes in terms of water use, water output or volumes processed. We only withdraw water from 3rd parties and discharge to 3rd parties. Therefore, water-related issues is assessed not to be an immediate strategic priority for our operations. However, we monitor and report water withdrawals, consumption and discharges in our direct operations. We do not foresee a major change in our water use processes in the coming years, but subject to increasing volumes, we consider water as a scope with potentially higher future impact on our operations.

Biodiversity

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

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

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

☑ Not an immediate strategic priority

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

We do not have significant impact on biodiversity as a direct result of our operations. Therefore, biodiversity risks do not have a substantial effect on our organization. Biodiversity issues is assessed not to be an immediate strategic priority for our operations. However; we have identified chronic bird strikes as a relevant item with biodiversity connection, where airborne birds collide with departing/landing aircraft, providing loss of living species on one hand and an important safety threat to the aircraft and passengers on board on the other. Istanbul, our main base of operations, is an important habitat and transit area for various bird species. As Pegasus Airlines, we adopted the Pegasus Wildlife Hazard Management Plan in 2021 with the support of independent consultants to reduce bird strikes, especially at our main hub at Istanbul Sabiha Gökçen Airport. For the effectiveness of the measures in this area, it is important that the airport authorities and other airline companies act jointly, and engaging stakeholders now forms the core focus of our plan. We do not foresee a major change in our biodiversity impact in the coming years, but subject to increasing prominence, we consider this matter as a scope with potentially higher biodiversity correlation in our operations.
[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Board chair

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Board Terms of Reference

☑ Board mandate

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets

☑ Overseeing and guiding scenario analysis

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Approving corporate policies and/or commitments

☑ Overseeing reporting, audit, and verification processes

☑ Monitoring the implementation of a climate transition plan

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Monitoring supplier compliance with organizational requirements

☑ Monitoring compliance with corporate policies and/or commitments

☑ Overseeing and guiding the development of a climate transition plan

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Monitoring the implementation of the business strategy

(4.1.2.7) Please explain

All our ESG efforts are carried out based on the Pegasus Airlines Corporate Sustainability Policy adopted by the Board of Directors in 2020. Our Corporate Sustainability Policy, opportunities and risk framework, strategic targets, key performance indicators and reporting structure are determined by the CEO, the Corporate Governance Committee, or the Board of Directors according to the governance matrix set out in our corporate procedures. Our Board of Directors reviewed and approved proposed integration of sustainability (ESG) targets and initiatives into our corporate strategy. Sustainability (ESG) actions are reported to the Board of Directors on a quarterly basis and were comprehensively reviewed at Board Meeting every year. General Counsel and Chief Sustainability Officer reports on the activities covered by the Policy to the Corporate Governance Committee quarterly. Board members are also informed quarterly and monthly through these reports and related updates. The Board of Directors further contributes to sustainability (ESG) oversight and guidance through the work in its various committees. Corporate Governance Committee is tasked with the quarterly oversight of the Company's sustainability (ESG) actions. Risk Committee on the other hand has identified ESG-related risks and determined the appropriate risk indicators, thresholds and risk appetite for the evaluation of these risk items. Governance structure we have established enables the evaluation of the holistic impact of climate and sustainability-related risks and opportunities on the Company at both senior management and Board levels. It also ensures that all major decisions and actions related to our operations are assessed in the context of their sustainability and climate implications. [Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Integrating knowledge of environmental issues into board nominating process

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ No, and we do not plan to within the next two years

(4.2.4) Primary reason for no board-level competency on this environmental issue

Select from:

☑ Not an immediate strategic priority

(4.2.5) Explain why your organization does not have a board with competence on this environmental issue

We do not have water-intensive processes in terms of water use, water output or volumes processed. We only use water from 3rd parties and our discharge is also made to 3rd parties. Therefore, water risks do not have a substantial effect on our organization. However; we monitor and report our direct operations water consumption and water use. We do not foresee a major change in our water use processes in the coming years, but subject to increasing volumes, we consider water as a scope with potentially higher future impact on our operations.
[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes

	Management-level responsibility for this environmental issue
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Conducting environmental scenario analysis

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other

☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

*CEO has the highest level of implementation responsibility for sustainability at Pegasus Airlines. In doing this, CEO is supported by the Chief Sustainability Officer directly reporting to the CEO, the ESG Steering Committee (providing regular evaluation of work at the management level, long*term goals and planning) and ESG Working Group/Focus Groups operating under the coordination of the Chief Sustainability Officer (to achieve 24 main sustainability goals as part of our current strategic plan 2022-2025). Chief Sustainability Officer reports the activities under the ESG Steering Committee and ESG Working Group/Focus Groups to the CEO on a weekly basis. CEO is an important spokesperson for Pegasus Airlines on sustainability.*

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

Our dedicated Sustainability Office is responsible for implementing our sustainability policy and our strategic sustainability targets. Our Sustainability Office is also responsible for coordinating and reporting on company-wide sustainability and ESG efforts. Our Chief Sustainability Officer (CSO) heads our Sustainability Office, who also undertakes the role of Company General Counsel. CSO reports directly to our CEO, and is also a member of the Executive Committee, Risk Review Board and ESG Steering Committee. CSO is responsible for facilitating communication between the (bringing senior management representatives to evaluate our long-term targets and to plan and monitor progress of work on sustainability and ESG), the ESG Working Group (facilitating communication among relevant business units and the ESG Focus Groups), and the Focus Groups (working on achieving the 24 main sustainability goals for 2022-2025), and reporting their work directly to the CEO. The work carried out by these functions is then passed to the Corporate Governance Committee every quarter and reported to the Board of Directors on a regular basis.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

Our dedicated Sustainability Office is responsible for implementing our sustainability policy and our strategic sustainability targets. Our Sustainability Office is also responsible for coordinating and reporting on company-wide sustainability and ESG efforts. Our Chief Sustainability Officer (CSO) heads our Sustainability Office, who also undertakes the role of Company General Counsel. CSO reports directly to our CEO, and is also a member of the Executive Committee, Risk Review Board and ESG Steering Committee. CSO is responsible for facilitating communication between the (bringing senior management representatives to evaluate our long-term targets and to plan and monitor progress of work on sustainability and ESG), the ESG Working Group (facilitating communication among relevant business units and the ESG Focus Groups), and the Focus Groups (working on achieving the 24 main sustainability goals for 2022-2025), and reporting their work directly to the CEO. The work carried out by these functions is then passed to the Corporate Governance Committee every quarter and reported to the Board of Directors on a regular basis.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing supplier compliance with environmental requirements

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Conducting environmental scenario analysis

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing environmental reporting, audit, and verification processes

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

Other

☑ Other, please specify :(Coordinating efforts among ESG Steering Committee and ESG Working Group & Focus Groups)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

Our dedicated Sustainability Office is responsible for implementing our sustainability policy and our strategic sustainability targets. Our Sustainability Office is also responsible for coordinating and reporting on company-wide sustainability and ESG efforts. Our Chief Sustainability Officer (CSO) heads our Sustainability Office, who also undertakes the role of Company General Counsel. CSO reports directly to our CEO, and is also a member of the Executive Committee, Risk Review Board

and ESG Steering Committee. CSO is responsible for facilitating communication between the (bringing senior management representatives to evaluate our long-term targets and to plan and monitor progress of work on sustainability and ESG), the ESG Working Group (facilitating communication among relevant business units and the ESG Focus Groups), and the Focus Groups (working on achieving the 24 main sustainability goals for 2022-2025), and reporting their work directly to the CEO. The work carried out by these functions is then passed to the Corporate Governance Committee every quarter and reported to the Board of Directors on a regular basis. Coordination and reporting of our Sustainability related activities, particularly concerning climate and other ESG elements, are the responsibility of the General Counsel and Chief Sustainability Officer. General Counsel and Chief Sustainability Officer ensures the effective management of opportunities and risks in this context.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Risk committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

Strategy and financial planning

☑ Conducting environmental scenario analysis

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

The Chairperson of the Risk Review Board (RRB) is our CEO. RRB is composed of high-level executives such as CFO, CCO, COO, CIO, CHRO and General Counsel & Chief Sustainability Officer. RRB assesses all types of risks, including climate-related risks according to our risk assessment matrix during their meetings and reviews the Company's bi-monthly Risk Management Reporting carried out under the scrutiny of the Risk Committee of the Board of Directors. Risk Committee has 3 members and is chaired by an independent member of the Board of Directors and the majority of its members are non-executive members of the Board of Directors. Following the assessment of RRB, significant risks and trends are reported to the Risk Committee by CEO and senior management.

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Committee

☑ Environmental, Social, Governance committee

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Conducting environmental scenario analysis

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Quarterly

(4.3.1.6) Please explain

Sustainability (ESG) Steering Committee is formed to bring together senior management representatives (CEO, CFO, CCO, COO, CFOO, CITO, CHRO, Marketing Director) and the Chief Sustainability Officer to evaluate our long-term targets and to plan and monitor the progress of work on sustainability and ESG.ESG Steering Committee reviews and guides strategy, risk management process and annual budgets and oversees the setting of corporate targets in scope of sustainability and climate related issues. Within the scope of the ESG Working Group, all detailed studies and sustainability perspectives, from suppliers to published policies, are examined and monitored. It convenes at least twice a year for responsibilities within its scope.
[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

8.9

(4.5.3) Please explain

Sustainability/climate-related matters are linked to our remuneration practices in several aspects. The remuneration of our Board members is carried out in accordance with the remuneration principles proposed annually to our shareholders at the General Assembly by the Corporate Governance Committee and resolved by the shareholders.For our employees, in addition to a fixed monthly salary and various fringe benefits, there are institutional or functional bonus practices based on short/long-term performance-based remuneration principles.For senior and mid-level management, the Company Goals influence their total performance score at decreasing rates depending on their level. In 2024, the weight of sustainability and environment-related individual performance objectives within the performance scorecards of the CEO and senior executives reporting directly to the CEO was 8.9%.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ No, but we plan to introduce them in the next two years

(4.5.3) Please explain

Currently we do not implement any incentives focusing on water.
[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Sustainability Officer (CSO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Achievement of environmental targets

☑ Organization performance against an environmental sustainability index

Strategy and financial planning

☑ Board approval of climate transition plan

Emission reduction

☑ Implementation of an emissions reduction initiative

☑ Increased share of renewable energy in total energy consumption

Resource use and efficiency

☑ Energy efficiency improvement

Policies and commitments

☑ Increased supplier compliance with environmental requirements

Engagement

☑ Increased engagement with suppliers on environmental issues

☑ Implementation of employee awareness campaign or training program on environmental issues

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

Incentives are an important part of the Company Compensation Management Policy. It is also regarded as an important tool for employee engagement on sustainability (ESG) issues. KPIs can vary significantly to the extent it has direct contribution to the Corporate Sustainability Strategy and Targets while it also supports the core work of the relevant employee. The time period can be specified as short or long according to the objectives set. The efficiency and target achievement steps given in the climate-related roadmap generally cover both time periods. Each year, both departmental and individual climate targets are selected by specific departments and added to the main target scope. The success percentage of personal targets affects the bonus received. The relationship between the climate-related company targets and the targets set as a department is monitored for a long time and is included in the scope of the long-term target with the step of efficiency and target tracking. The climate targets can be considered regional and inter-regional in scope. Emission efficiency is relevant to our activities in each region, while energy efficiency is added to the targets in our headquarters region.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The incentives contribute to the implementation of our climate commitments and our transition plan in two ways: First, the achievement directly serves a climate-related target achievement. Second, the incentive – voluntary in nature – better engages volunteering employees to own and lead sustainability initiatives in their work and in their own department.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Financial Officer (CFO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Resource use and efficiency

☑ Energy efficiency improvement

Policies and commitments

☑ Increased supplier compliance with environmental requirements

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

Energy efficiency covers our fleet investment, operational efficiency work, digitalization efforts and development of human resource capabilities, all cumulatively having an impact on our unit cost base, which forms an important part of the corporate scorecard and the performance-based compensation of C-level senior managers. In the field of operations and energy, another aspect of the work involves engaging with suppliers on environmental issues and taking action. This step supports the goals and actions set forth in this area.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Energy efficiency and fleet transformation are important areas that directly affect our climate efforts. In this context, the communication we establish with our suppliers supports our sustainability and emission reduction targets.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Senior-mid management

☑ Buyers/purchasers

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Emission reduction

☑ Reduction in emissions intensity

Resource use and efficiency

☑ Energy efficiency improvement

☑ Reduction in total energy consumption

Engagement

☑ Increased engagement with suppliers on environmental issues

☑ Implementation of employee awareness campaign or training program on environmental issues

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ The incentives are not linked to an incentive plan, or equivalent (e.g. discretionary bonus in the reporting year)

(4.5.1.5) Further details of incentives

Buyers, Purchaser and all employees are encouraged to submit innovative ideas which may be eligible in their contribution to sustainability as part of the Corporate Innovation Idea Scheme “FLYDEA”. Ideas for “FLYDEA” are welcomed in eight categories, one of them being Sustainability, Environment & OHS. Ideas are evaluated by a tiered review system, voted by employees and selected ideas are scheduled for implementation while those submitting the ideas are rewarded. FLYDEA incorporates a rewarding program (gift card) that can be spent in certain areas on behalf of the winner. This system, which is defined and presented on behalf of the person, is equivalent to the monetary award given to the person. For a suggestion to be evaluated as successful in Sustainability, Environment & OHS Category with respect to our climate-related strategies, it has to be evaluated to result in one or more of the following: - Reductions in emission intensity - Improvement in energy efficiency - Reduction in total energy consumption - Increase in employee awareness in climate-related issues The employees are also rewarded via internal company recognition through Sustainability/ESG Events and Publications.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The incentives contribute to the implementation of our climate commitments and our transition plan in two ways: First, the achievement directly serves a climate-related target achievement. Second, the incentive – voluntary in nature – better engages volunteering employees to own and lead sustainability initiatives in their work and in their own department.
[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply
☑ Climate change
☑ Water
☑ Biodiversity

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(4.6.1.4) Explain the coverage

Two separate polices apply. Pegasus Corporate Sustainability Policy is adopted by our Board of Directors and sets high-level corporate commitment on environmental, social and governance targets. Pegasus Environment Policy is adopted by our CEO, and sets our corporate commitment in the area of environment. Both policies cover our direct operations and the upstream/downstream value chain.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

☑ Commitment to 100% renewable energy

☑ Commitment to net-zero emissions

☑ Commitment to not funding climate-denial or lobbying against climate regulations

Social commitments

☑ Commitment to promote gender equality and women’s empowerment

☑ Commitment to respect internationally recognized human rights

☑ Other social commitment, please specify :Gender Balance: IATA 25by2025

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ Yes, in line with another global environmental treaty or policy goal, please specify :Sustainable Development Goal 13: Climate Change

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

environmental-policy.pdf
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☑ UN Global Compact

☑ Other, please specify :IATA

(4.10.3) Describe your organization’s role within each framework or initiative

Pegasus Airlines has been an active United Nations Global Compact (UNGC) participant since 2019 and has become the first airline in Türkiye to join the United Nations (UN) Global Compact. Pegasus also was the first participant in the UNGC "Communication on Progress: 2022 Early Adopter Program". The UN Global Compact has launched an enhanced Communication on Progress Reporting (CoP) platform to add value and streamline sustainability reporting for all its members. The CoP provides opportunities such as increasing the reputation and brand value of the organization, measuring progress, and sector benchmarking by

transparently sharing the work towards the SDG Ten Principles. In this annual reporting system, a report is prepared by answering sector-specific and general questions under ESG headings. Pegasus Airlines joined the early adopters program and became one of the first companies to report. Our CEO is currently vice-chair of the board of directors of the local Turkish UNGC association. Pegasus joined the world's leading airlines in the resolution to achieve "Net Zero Carbon Emissions by 2050" approved at The International Air Transport Association's (IATA) 77th Annual General Meeting. With "Net Zero Carbon Emissions by 2050" commitment, which aligns with the target of the Paris Agreement for global warming not to exceed 1.5°C, the aim is to achieve net zero carbon emissions by 2050 and to make flying sustainable. Pegasus supports and commits to the target of achieving net zero carbon emissions by 2050 by utilizing the opportunities provided to aviation sector through technological advances, with the support from the energy sector and in coordination with stakeholders. IATA's 2050 Net zero strategy calls for reducing carbon emissions as much as possible through in-sector solutions such as the use of sustainable aviation fuels, new aircraft technologies, more efficient operations and infrastructure, and the development of new zero-emission energy sources such as electricity and hydrogen power. Emissions that cannot be eliminated at source will be eliminated through out-of-sector options such as carbon capture and storage and reliable offset schemes. Also, In 2019, we became one of the first airlines in the world to join IATA's "25by2025" initiative, a voluntary campaign for IATA member airlines to improve female representation in the industry by 25%, or up to a minimum of 25% by 2025. Our Board of Directors revised our "Policy on Representation in the Board of Directors" as a solid commitment to the campaign, stating there would be a minimum female representation of 25% on the Board of Directors by 2025.
[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

☑ Yes, we engaged directly with policy makers

☑ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☑ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

☑ Paris Agreement

☑ Another global environmental treaty or policy goal, please specify :Sustainable Development Goal 13: Climate Change

(4.11.4) Attach commitment or position statement

PGS Net zero - UNGC - COP.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☑ No

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Pegasus Airlines has committed to the "Net Zero Carbon Emissions-2050" decision adopted by the International Air Transport Association (IATA), and has been among the leading airline companies in the world that has made this commitment. With this commitment, which follows the target of the Paris Agreement, which was also accepted by our country in 2021, to ensure that global warming does not exceed 1.5C, it is aimed to reach a net zero carbon by 2050. Türkiye is preparing to issue a SAF regulation to increase the use of SAF within its borders and encourage production. We participated in the draft regulation evaluation and opinion stages and provided information about our operational processes&targets within the scope of the aircraft operator.By participating in meetings where all perspectives were assessed, we aimed to contribute to the formulation of regulations&to support all initiatives that address issues related to combating climate change.Pegasus Airlines has been an active United Nations Global Compact (UNGC) participant since 2019 and has become the first airline in Türkiye to join the UNGC. Pegasus also was the first participant in the UNGC "Communication on Progress”2022 Early Adopter Program".The UNGC has launched an enhanced Communication on Progress Reporting (CoP) platform to add value and streamline sustainability reporting for all its members.The CoP provides opportunities as increasing the reputation&brand value of the organization, measuring progress§or benchmarking by transparently sharing the work towards the SDG Ten Principles. In this annual system, a report is prepared by answering sector-specific and general questions under ESG headings. Our CEO is currently vice-chair of the board of directors of the local Turkish UNGC association. The UNGC is meeting with regional rule makers to support the fight against climate change and help adaptation during the transition. They work to provide transparent reporting, organize interactive trainings where they can share knowledge&best practices across companies and sectors(negotiate on behalf of regulations). We support climate action&social good practices through reporting&training. As Pegasus, we actively contribute to the transformation of sustainable aviation by supporting the Türkiye Sustainable Aviation Platform (TSAA).TSAA aims to guide the Turkish aviation industry on its decarbonization journey, promote sustainability practices across the sector, and foster crosssector collaboration.
[Fixed row]

(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

Row 1

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

We engaged with the DGCA on Sustainable Aviation Fuels (SAF) and the draft Türkiye Green Taxonomy Regulation. We joined the SAF Directive workshop and provided feedback to enhance the draft's feasibility and alignment with national needs. We also submitted our views on the taxonomy, emphasizing the proper inclusion of the aviation sector in line with international practices.

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☑ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Energy and renewables

☑ Alternative fuels

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☑ National

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☑ Turkey

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☑ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

The draft version of the Regulation on the use of Sustainable Aviation Fuel for international flights departing from Türkiye has been consulted. The opinion includes recommendations on specific small impact applications and a more effective approach to the use. Recommendations were provided on the draft taxonomy and its content structure, focusing on alignment with the EU framework and supporting emission reduction, while considering the sector's transition to net-zero emissions. For this reason, the option "support with minor exceptions" has been chosen.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☑ Ad-hoc meetings

☑ Participation in working groups organized by policy makers

☑ Responding to consultations

☑ Submitting written proposals/inquiries

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Sustainable Aviation Fuels (SAF) play a critical role in the fight against climate change. By replacing fossil fuels, SAF significantly reduces aircraft carbon emissions and thus minimizes the environmental impact of the aviation industry. Widespread adoption of SAF is an important step in efforts to limit global warming and a critical component in achieving international climate change goals. As Pegasus, SAF/LCAF is one of our 4 main action areas in our 2050 net zero target that we have committed to. We contribute to both the use and production of SAF fuel, which supports an important step in our impact on zero emissions and sustainable future. Every climate and environmental study and report published with the principle of transparency supports the dissemination of scientific findings, innovative technologies and best practices to a wide audience. It encourages the public and sectors to be informed and raise awareness on climate change. Furthermore, transparent information flows and public information activities enable decision-makers and practitioners to develop more informed strategies and contribute to strengthening community support and cooperation. We aim to contribute to this impact in every development and disclosure report we publish, including the UNGC sustainable development goals. We evaluate best practices and transparently publish our own best practices to contribute to and encourage the sector.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☑ Paris Agreement

☑ Another global environmental treaty or policy goal, please specify :UNGC Sustainable Development Goal 13

[Add row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Global

☑ International Air Transport Association

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization’s position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The mission of the International Air Transport Association (IATA) is to represent, lead and serve the airline industry. One of its main objectives is to promote a better understanding of the air transport sector among decision-makers and to raise awareness of the benefits of aviation to national and global economies. It evaluates the requirements set out by rule-makers and regulators from the perspective of the airline industry and makes reasoned decisions. One of its objectives is to help airlines operate safely, securely, efficiently and economically within clearly defined rules. In this context, as a company within the aviation industry, we share the same values with IATA to protect rights and to be treated on an understandable and equal footing. Every month, IATA conveys global developments within the scope of climate to its member airlines and supports raising awareness. In areas where it thinks that the sectoral requirements related to climate are not supported, it works to take action in the right sense by taking the opinions of airline companies. In 2024, it provided information flow to its member airlines in this context with the "Environmental Policy Update" conferences are organized every month. As Pegasus Airlines, we commit to the "Net Zero Carbon Emissions by 2050" resolution approved at IATA's 77th Annual General Meeting. Thus, we have stated that we are in parallel with IATA in terms of combating and taking action against climate change.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

3473898

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

As an IATA member airline, we are part of the association, contributing to the number and scope of airlines represented by IATA. At the same time, we have the opportunity to benefit from the services offered by IATA. The given figure is the membership fees paid in 2024.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

☑ Another global environmental treaty or policy goal, please specify :UNGC Sustainable Development Goal 13 on Climate Action

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☑ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

☑ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☑ GRI

☑ Other, please specify :Türkiye Sustainability Reporting Standards

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Emission targets

☑ Emissions figures

☑ Risks & Opportunities

☑ Content of environmental policies

☑ Value chain engagement

☑ Dependencies & Impacts

☑ Biodiversity indicators

☑ Public policy engagement

☑ Water accounting figures

(4.12.1.6) Page/section reference

Pegasus Airlines 2024 Sustainability Report presents our sustainability efforts, stakeholder engagement, ESG impact, and value creation. Prepared in line with GRI Standards and Türkiye Sustainability Reporting Standards (TSRS), it also covers our approach to UNGC, IATA's 2050 Net Zero Target, and 25by2025 goals.

(4.12.1.7) Attach the relevant publication

pgsus-tsrs-2024-sustainability-report.pdf

(4.12.1.8) Comment

Our 2024 Sustainability Report is prepared to present our efforts in sustainability, our stakeholder engagement, and the value we create across key ESG areas. For the first time in our corporate history, the report is aligned with the Türkiye Sustainability Reporting Standards (TSRS), including TSRS 1 (General Requirements) and TSRS 2 (Climate-Related Disclosures), issued by the Turkish Public Oversight Authority (KGK), alongside the Global Reporting Initiative (GRI) Standards. Sector-specific disclosures are also included, based on Annexes 60 and 61 of TSRS. The first section covers our sustainability strategy, governance, risk management, and metrics and targets, with limited assurance by independent auditors. The second section reflects our sustainability approach under the Integrated Reporting value creation model and is structured around our core pillars: "We are Moving Towards a Cleaner Future," "We are Moving Towards an Equal and Harmonious Future," and "We are Moving Towards a Better Future Together." These align with GRI Standards and highlight our safety, security, technology, and innovation-driven initiatives. The report covers the period from January 1 to December 31, 2024, with performance metrics audited for 2024 and comparative data from the past three years.
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

☑ Yes

(5.1.2) Frequency of analysis

Select from:

☑ Annually

Water

(5.1.1) Use of scenario analysis

Select from:

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

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☑ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

We do not have water-intensive processes in terms of water use, water output or volumes processed. We only use water from 3rd parties and our discharge is also made to 3rd parties. Therefore, water risks do not have a substantial effect on our organization. As water risks and impacts are not critical for us, water scenario analysis is not prioritized in this context. However, we monitor and report our direct operations water consumption and water use. We do not foresee a major change

in our water use processes in the coming years, but subject to increasing volumes, we consider water as a scope with potentially higher future impact on our operations.
[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization’s scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios
☑ IEA NZE 2050

(5.1.1.3) Approach to scenario

Select from:
☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:
☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply
☑ Policy
☑ Market
☑ Liability
☑ Reputation
☑ Technology
☑ Acute physical
☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2023

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2040

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

Stakeholder and customer demands

☑ Consumer attention to impact

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

Macro and microeconomy

☑ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

According to this scenario by 2040, 50% of fuels used in aviation are low-emission bio-based fuels and by 2050 the industry relies largely on biofuels and synthetic fuels. In this scenario it is also stated that aviation emissions are difficult to be eliminated entirely. As outlined in the scenario, bioenergy, hydrogen and hydrogen-based fuels account for less than 1% of the energy consumed in aviation today, rising to almost 15% by 2030 and 80% by 2050. Passenger aviation demand will increase globally by close to three times between 2022 and 2050 in the absence of the assumed changes in behavior in the NZE. In this scenario assessing energy sectors, aviation represents 5% of cumulative energy reductions. Key impacts and targets in the roadmap to achieve "Net Zero 2050": • In aviation, the use of sustainable aviation fuel (SAF) will need to increase more than twice as fast as in the NZE Scenario and account for around 25% of the aviation fuel market. • Keeping air travel for business purposes at 2019 levels. Although business trips fell to almost zero in 2020, they accounted for just over one-quarter of air travel before the pandemic. This avoids around 110 Mt CO2 in 2050 in the NZE. • Keeping long-haul flights (more than six hours) for leisure purposes at 2019 levels. Emissions from an average long-haul flight are 35-times greater than from a regional flight (less than one hour). This affects less than 2% of flights but avoids 70 Mt CO2 in 2050. As in every scenario, uncertainties should be examined with a certain range of variability. The cost of the technologies determined within the scope of the scenario, the support and belief of the public in the projects created can accelerate or hinder the process. Countries are working to accelerate the fight against climate change and emission reduction processes through regulatory changes, especially in the field of aviation. ETS systems evaluate the general aviation baseline and mitigation commitments in line with the Paris Agreement and aim to attract all players to this point. We are committed to reduce our emission intensity with new technologies (SAF/LCAF etc.) in line with regulatory compliance and given targets. The obligations expected by the regions in this regard may support this, but not taking action or not applying the appropriate procedures in a balanced manner may become one of the obstacles to taking action due to excessive costs and therefor.

(5.1.1.11) Rationale for choice of scenario

We have selected the IEA NZE2050 scenario as it presents a roadmap for the energy sector to transition to a net zero energy system by 2050. The report outlined a specific yet achievable route for the global energy sector to help meet the Paris Agreement's objective of capping the increase in global temperatures to 1.5 °C above pre-industrial levels. Pegasus 2050 Net Zero Roadmap has 4 important main topics. One of the main topics in our Sustainability Strategy is to reduce our absolute emissions. The NZE2050 scenario provides a realistic approach for the airline industry. As an example, according to the most recent assessment, synthetic kerosene derived from hydrogen and CO2 has significant potential as a fuel in aviation, as indicated in the scenario. This new application grows from negligible production in 2022 in the NZE Scenario to over 2 billion liters per year in 2030 (still less than 1% of aviation demand). Announced demand commitments to purchase volumes of this fuel from the aviation industry fall far short of the levels projected in the scenario, partly due to a lack of installed capacity. However, building capacity, securing the supply of carbon neutral CO2 and low emission hydrogen and establishing purchase commitments in line with the NZE Scenario has been described as challenging. In the case of SAF, which is also an important factor in our financial planning and procurement potential, a realistic approach was taken and a study was carried out on the low demand and its evaluation accordingly, as SAF prices are three to four times higher than conventional jet fuel. The scenario presents the SAF assessment with a 2050 perspective, including the EU ETS system, which we are also a part of, as the scope of operation. The baseline scenario assessment argues that commitments and incentives are not sufficient to meet the Paris Agreement target, arguing that by 2035 emissions should be reduced by 80% in advanced economies and 60% in emerging market and developing economies compared to 2022 levels. By evaluating this scenario, it is possible to create and update a realistic roadmap. The statements, which emphasize both financial and action weight within the scope of the perspective, are aimed to contribute to the projects to be implemented in the future and to support us in achieving the 2050 Net Zero target.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP5

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 4.0°C and above

(5.1.1.7) Reference year

2023

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2040

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Speed of change (to state of nature and/or ecosystem services)

Stakeholder and customer demands

☑ Impact of nature service delivery on consumer

Regulators, legal and policy regimes

☑ Level of action (from local to global)

Relevant technology and science

☑ Other relevant technology and science driving forces, please specify :Storyline assumption of slow technological change

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The IPCC scenarios are designed to cover a wide range of challenges related to climate change mitigation and adaptation. For the assessment of climate impacts, risks, and adaptation, these scenarios can be used to evaluate future exposure, vulnerability, and adaptation challenges. They present various scenario alternatives that offer a realistic perspective by evaluating the impacts of climate change under potential development paths, allowing for the achievement of results aligned with the defined goals. From this perspective, to assess the impacts of physical and socio-economic risks in a scenario where the fight against climate change progresses slowly, IPCC RCP 8.5 and SSP 8.5 were selected as reference scenarios. These scenarios stand out as ones in which sustainability targets are pursued slowly and ineffectively across sectors and include factors such as high population growth, increasing greenhouse gas emissions, high economic growth, continued fossil fuel use, acute and chronic physical risks and delayed sustainable investments.This scenario represents a highly pessimistic outlook, characterized by high population growth and significant economic expansion. Also, our analysis concentrates on both acute and chronic physical risks, examining indicators such as increased severity

of extreme weather events, including heat waves, storms, and heavy precipitation. We focus on medium-to-long-term impacts, as these are anticipated to become more pronounced over time. Our scenario analysis encompasses all aspects of our operations, including supply chain activities. In the long term, we anticipate shifts in consumer preferences, flight routes, and the frequency of flights due to climate-related factors. Additionally, summer destinations may be affected by rising sea levels or significant temperature increases, potentially leading to the suspension of flights to those locations.

(5.1.1.11) Rationale for choice of scenario

IPCC RCP 8.5 and SSP 8.5 were chosen as one of the worst-case scenarios in order to assess the impacts of physical and socio-economic risks of climate change on our business. This is a very pessimistic quantitative scenario that contains factors like high population and high economic growth. We focus on the acute and chronic physical risks gathering several indicators categorized in increased severity of the extreme weather events like heat waves, storms, heavy precipitation, high population growth, increasing greenhouse gas emissions, high economic growth, continued fossil fuel use, and delayed sustainable investments. All our operations are included in the scenario analysis including the supply chain operations. In the long-term, consumer preferences, flight routes, number of flights are expected to change due to climate-related impacts. Also summer-locations may be impacted for sea level rise or temperatures may increase drastically in some regions so flights to those destinations may be suspended. The results of the scenario analysis impacted Pegasus Airlines strategies as follows: - To become more resilient to the impacts of climate change (We evaluate alternative and efficient flight routes using real-time weather data through the OCC department. This supports both safer operations and reduced emissions through optimized routing.) - In 2021, we were among the leading airlines to join the "2050 Net Zero Carbon Emissions" target adopted at the 77th Annual General Assembly of the International Air Transport Association (IATA). - Also in 2021, we strengthened our commitment by setting an interim target: to reduce flight-related carbon emissions per revenue passenger kilometer (RPK) by 20% by 2030, compared to 2019.
[Add row]

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

According to NZE2050 Scenario, aviation industry will face drastic changes and if these changes occur it may have serious implications on our business. The results of the scenario analysis have informed the following decisions and or actions in relation to target setting and transition planning: - Setting a 2050 Net Zero Target - Setting an interim Carbon Emission Target for the year 2030, - Switching to Alternative Energy Sources (SAF/LCAF) - Switching to New Generation Aircraft Our 2050 net zero roadmap was shaped by these 4 main topics. Until alternative energy sources become technologically available, decarbonization will be achieved through the use of Sustainable Aviation Fuels (SAF). Since production is limited, in 2024, we purchase SAF as much as can be procured with the scenario approach and emission reduction. In order to prevent the negative impact of climate change, we examine the path followed by the IEA NZE2050 scenario and evaluate our actions within this scope. We evaluate the applicability of limited developments in the aviation industry by measuring them. Our purpose in choosing the NZE 2050 Scenario is to evaluate the long-term transitional impacts, risks and opportunities of climate change on our business. In order to achieve net zero goal, we need to decide what factors we need to take into account and need to change. We also prioritized examining this scenario to assess the most negative transitional impacts on aviation industry and to start working on better solutions for our industry that can achieve the same global results. One of the major steps we took within the scope of scenario assessment was to conduct a risk/opportunity analysis and clearly present the current situation in our sustainability report, as well as to share our projections about our expectations and plans for the future. We have also integrated the risks we assessed into our quarterly risk assessment reports. We have created a space where we control our development and bottlenecks. At Pegasus, our sustainability ventures, whether related to climate action, gender balance, or transparency, only truly make sense if they form part of a larger, global effort. With our 2024 sustainability report, which assesses climate-related risks and opportunities based on scenario analyses, we can transparently communicate the work we are involved in, the areas we are responsible for to the relevant people, the steps we have taken towards Net Zero.
[Fixed row]

(5.2) Does your organization’s strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

☑ No, but we are developing a climate transition plan within the next two years

(5.2.15) Primary reason for not having a climate transition plan that aligns with a 1.5°C world

Select from:

☑ No standardized procedure

(5.2.16) Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world

As Pegasus, we have created a roadmap by analyzing scenario analyses and evaluating our emission sources. In this roadmap, our aim is to implement the technologies and practices that we need to evaluate and integrate to achieve zero emissions. We became one of the first airlines to sign the "2050 Net Zero Carbon Emission" decision adopted at the IATA 77th Annual Meeting in 2021. In line with this commitment, we aim to achieve a net-zero carbon emission business model by 2050. In order to achieve our Net Zero Carbon Emission target by 2050, we continue to work under four main headings: New Aircraft Technologies, Operational Efficiency, Legal Carbon Offsetting and Sustainable Aviation Fuels (SAF, including LCAF). Under these four headings, a net zero target has been set to the extent that the sector and developments currently foresee. However, the speed-impact-capacity of developments constitutes the most variable and adaptable aspect of roadmaps. Therefore, we aim to harmonize our roadmap with 1.5 degrees by shaping it with these predictions. Our Climate Transformation Roadmap shows the contribution of each main topic in achieving our goal from 2016, when we first took delivery of the new generation Airbus NEO aircraft, until 2050. Our plan is presented with our significant expectations and also illustrates the opportunities and risks to our current projections. The realization of these or other opportunities and risks may require changes to our current projections.
[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:
☑ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply
☑ Products and services
☑ Upstream/downstream value chain
☑ Investment in R&D
☑ Operations
[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our products and services are impacted by climate related changes, regulations, financing environment, passenger, employee and community demand. Under the guidance of our Board of Directors we included sustainability (ESG) as one of the main goals in our strategy. We have developed a robust action plan broken down into specific actions to address environmental targets relating to our products and services. These actions also consolidate our existing strategic actions on products and services affected by climate risks and opportunities. Examples include fleet transformation, transition to electric vehicles in airport operations, operational efficiency and digitalization efforts, occupation of energy efficient buildings and waste reduction initiatives. In our 2050 net zero roadmap and sustainability report, we explain our action plans and targets in detail. As noted in 3.1.1, assessing risks and opportunities, such as effective fleet transformation, is necessary to manage transition risks, evaluate/adapt strategy and improve energy efficiency in line with the net zero roadmap.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our value chain is exposed to climate related changes, regulations, financing environment, passenger, employee and community demand. Under the guidance of our Board of Directors we included sustainability (ESG) as one of the main goals in our strategy. We know that as a strong organization nurtured by strong people, we can create more value and impact for our environment and society. In line with this awareness and approach, we are aware that we can increase the value and impact we will create together with our value chain, starting from procurement to our operations, marketing, sales and after-sales services. We monitor the work we carry out with our stakeholders at the sub-breakdown level, and take the necessary actions to ensure its continuity, to increase our cooperation on environmental, social and economic issues, and to effectively manage the value we create mutually. In 2023, we published our "Pegasus Value Chain Sustainability Compliance Framework". Our approach here aims to ensure efficiency in cooperation and solidarity in the field of sustainability, to encourage new sustainable business methods and to increase our social benefit with our stakeholders in today's world where economic solutions alone are not enough, the importance of environmental and social issues is increasing, and their effects are felt more. Our Sustainability Compliance Framework explains the issues of safety and security, people and society, environment, ethics and transparency, which we attach importance to and see opportunities for improvement in line with this purpose, and sets out our expectations from our value chain in the context of these issues. In 3.1.1 and 3.6.1, we explain in detail how we address risks and opportunities. In light of this information, we share the issues that are important to us in our communication with our value chain and that we want to take action on, and we integrate this into both our financial and strategic planning.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

We regularly allocate resources to breakthroughs in aviation technologies and research and development activities within the company. In our R&D studies for operations in 2024, similar to 2023, we focused on a more precise and in-depth analysis of our operational data. In 2024, the amount of expenditure we dedicated to R&D activities is around 12.14 million TL. Our R&D investment focus is exposed to climate related changes, regulations, financing environment, passenger, employee and community demand. We have developed a robust action plan broken down into specific actions to address R&D activities. These actions also consolidate our existing strategic actions R&D such as development of electronic flight deck solutions to achieve paperless cockpit and aircraft weight reduction. Examples include partnerships for exploring the use of sustainable aviation fuels and hydrogen in airline and airport operations. In Section 3.6.1, we explain the financial contribution of our investments and how they support our emission reductions. We also share the awareness of our support for technologies and developments in detail.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Operation is an important component that affects both the opportunity and risk sides of our strategy. Operational efficiency means performing operations in the most efficient manner, making the best use of resources at every stage by utilizing new generation resources and advanced technological infrastructure. This includes, in particular, utilizing the aircraft fleet and human resources at the right place and time. Improving operational efficiency not only ensures the effective use of resources, but also contributes to sustainability. However, operational efficiency is not limited to internal management strategies. The regulations of Türkiye, the countries we fly to and the rules set by international standard-setting organizations have a significant impact on our operations. Countries and international standard setters shape our operations by setting aviation-related rules and standards. These regulations can directly impact operational efficiency and impose compliance requirements. Operational efficiency is a strategy that affects both sides, taking into account not only internal processes, but also national and international regulations. This includes increasing efficiency and ensuring sustainability, as well as adapting to regulatory frameworks. Additionally, operational efficiency must consider the impact of both acute and chronic weather events, which can affect the entire operational process and are carefully evaluated in the strategy. In section 3.1.1 we assess the risks and impacts of regulations for us, while in section 3.6.1 we assess the operational and environmental contribution of new investments and fleet. In these sections, we share in detail the areas where developments and expected changes will affect our strategy and financial planning.
[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Assets

☑ Revenues

☑ Access to capital

☑ Capital allocation

☑ Liabilities
☑ Direct costs
☑ Indirect costs
☑ Capital expenditures
☑ Acquisitions and divestments

(5.3.2.2) Effect type

Select all that apply
☑ Risks
☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply
☑ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

REVENUE:Consumer sensitivity to lower carbon footprint is starting to affect consumer demand. This leads us to incorporate new components in our product&service offer, carryout demand projects and incorporate these actions in revenue planning. DIRECT&INDIRECT COSTS:Climate-related risks&opportunities have influenced our financial planning for direct&indirect costs. As our services include transportation of passengers, we classify fuels that we use in our aircraft as a direct cost. Any climate-related increase in fuel prices will directly impact our OPEX. Sustainable aviation fuel and offsetting costs will be net additional direct cost burdens on airlines. These risks are assessed to have a medium to high financial impact. Also, climate-change related extreme weather events may harm our aircraft. This harm is classified under indirect costs in our financial planning. All time horizons are covered by the financial planning. CAPEX&CAPITAL ALLOCATION:Climate-related risks have influenced our financial planning especially for CAPEX and allocation. During budgeting and long-term fleet planning, CAPEX and allocation to emissions-efficient assets, emissions reducing technology and products are identified and addressed. ACQUISITIONS & DIVESTMENTS:We are evaluating investment opportunities for biofuel and alternative energy development for our operations. ACCESS TO CAPITAL:As a publicly traded company, we are facing increased demands from the investor community to address certain ESG-related expectation for investment eligibility. ASSETS:Our main assets are our aircraft, and they are impacted by extreme weather events. Although currently the magnitude of these impacts are low, we believe in the long term the impacts may be medium. LIABILITIES:In 2022, we used our first ever SLL financing for 10 new Airbus A321-Neo Aircraft joining our fleet. This represented 59% of our aircraft deliveries in 2022. Cost of financing is directly linked to our performance on the incorporated ESG targets. Likewise direct expenses are impacted by climate-related risks in terms of cost increase or new cost items. Our fleet transformation with younger/efficient aircraft types is an integral part of our sustainability strategy.We explain the impact&assessment of this strategy in section 3.6.1.In 2024, we present the contribution and planning of our new generation aircraft joining the fleet.At the same time, we explain the impact of this contribution in our risk assessment in section 3.1.1.
[Add row]

(5.4) In your organization’s financial accounting, do you identify spending/revenue that is aligned with your organization’s climate transition?

	Identification of spending/revenue that is aligned with your organization’s climate transition	Methodology or framework used to assess alignment with your organization’s climate transition
	Select from: ☑ Yes	*Select all that apply* ☑ Other methodology or framework

[Fixed row]

(5.4.1) Quantify the amount and percentage share of your spending/revenue that is aligned with your organization’s climate transition.

Row 1

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ Other, please specify :Monitoring and evaluation with KPIs

(5.4.1.5) Financial metric

Select from:

☑ CAPEX

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

32640736341

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

19.63

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

15.7

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

15.7

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition

To evaluate the alignment of our fleet transformation with the 2050 net zero targets and emission reduction goals, we use the following criteria:Emission Reduction Potential, Sustainable Technologies and Compliance/Long-Term Impact. Emission Reduction Potential: The potential of vehicles in fleet transformation to reduce emissions is assessed, including their fuel efficiency and carbon emissions. (Tracking KPI emission intensity - gCO2/RPK) Sustainable technologies in fleet transformation include the use of Sustainable Aviation Fuel (SAF), which significantly reduces carbon emissions compared to conventional jet fuels, contributing to our net zero targets and enhancing overall environmental performance. (Tracking KPI - SAF Usage ton) Long-Term Impact and Policy and Regulation Compliance: Fleet transformation is evaluated for its long-term emission reduction benefits and its contribution to achieving net zero targets. Alignment with national and international climate policies and compliance with carbon emission regulations are reviewed. (Tracking KPI - environmental penalty) Activities, assets, technologies, and services not aligned include diesel and petrol vehicles, which produce high emissions, failing to meet net zero targets. Traditional internal combustion engine technologies also contribute to high emissions. Stricter climate policies and carbon regulations are expected to drive the adoption of sustainable vehicles. The forecast for 2030 is considered the same as 2025. Since 2030 specific investment and financial assessment may vary, the same value as 2025 has been stated. In summary, fleet transformation aligned with net zero targets involves investing in low-emission technologies and reducing the environmental impact of existing vehicles. This strategy will help achieve sustainability goals and reduce long-term costs.
[Add row]

(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

(5.5.1) Investment in low-carbon R&D

Select from:
☑ Yes

(5.5.2) Comment

In our company, we operate a model that constantly researches and develops digitalization and innovation opportunities in corporate, commercial and operational areas. We evaluate our innovative works and solution proposals that will cooperate with technology within our fields of work and business requirements, with the guidance of our business units or the information technology department. We are working on bringing practical and development-oriented solutions into the system by evaluating practical and development-oriented solutions in every field where we can use technology. Every value we add to our processes with technology contributes to the improvement of the travel experience with each passing day. We regularly allocate resources to breakthroughs in aviation technologies and research and development activities within the company. In our R&D studies for operations in 2024, similar to 2023, we focused on a more precise and in-depth analysis of our operational data. In 2024, the amount of expenditure we dedicated to R&D activities is around 12.14 million TL.
[Fixed row]

(5.5.8) Provide details of your organization’s investments in low-carbon R&D for transport-related activities over the last three years.

Row 1

(5.5.8.1) Activity

Select all that apply
☑ Aviation

(5.5.8.2) Technology area

Select from:
☑ Operations

(5.5.8.3) Stage of development in the reporting year

Select from:
☑ Small scale commercial deployment

(5.5.8.4) Average % of total R&D investment over the last 3 years

25.8

(5.5.8.5) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

12144000

(5.5.8.6) Average % of total R&D investment planned over the next 5 years

26

(5.5.8.7) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

In our company, we operate a model that constantly researches and develops digitalization and innovation opportunities in corporate, commercial and operational areas. We evaluate our innovative works and solution proposals that will cooperate with technology within our fields of work and business requirements, with the guidance of our business units or the information technology department. Within the scope of our activities, we work to reduce our carbon footprint in every possible area. In addition to the fleet transformation, where we have already achieved the greatest gains, we continue our efforts to reduce our carbon footprint through operational efficiency studies. Many lean and efficient operation practices, from fuel efficiency projects, improvements in route and flight management, to efficiency in ground operations, contribute to our roadmap and will continue to contribute in the coming years. Apart from these, sustainable aviation fuels are an important part of our roadmap. We expect the energy transition to become a key driver for our Net Zero Target in the long term, as the supply and prices of SAF/LCAF products become affordable. We evaluate and support projects to provide and use low-emission alternatives to the aviation fuel we use while performing our operations. We continue to increase our initiatives for the production and use of non-fossil aviation fuels that will have an impact in this field with SAF, which provides CO2 emission reduction in circular consumption, which we used for the first time in 2022 and continue to use by increasing its use in 2023 and 2024.
[Add row]

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

(5.9.1) Water-related CAPEX (+/- % change)

0

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

0

(5.9.3) Water-related OPEX (+/- % change)

29.4

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

5

(5.9.5) Please explain

There is no water related CAPEX and it is not expected in the future.The OPEX related to clean water usage are influenced by factors including the costs of routine water quality and general analyses.These factors contribute to an increase in OPEX as they necessitate ongoing monitoring and necessary upgrades to ensure water quality standards are met.Particularly, the expenses associated with drinking water analysis&systems result in higher operational costs.In 2024, additional cost was incurred due to maintenance of water distribution roads&purchase of operational equipment.Given the expectation that there will be no significant changes&increases in usage in the foreseeable future, it is anticipated that these expenditures will remain relatively stable.Long-term planning and the effective use of existing infrastructure are expected to mitigate substantial fluctuations in costs, maintaining stability in annual expenditures.This will help in keeping OPEX under control in the coming years.
[Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: ☑ Yes	*Select all that apply* ☑ Carbon

[Fixed row]

(5.10.1) Provide details of your organization's internal price on carbon.

Row 1

(5.10.1.1) Type of pricing scheme

Select from:

☑ Shadow price

(5.10.1.2) Objectives for implementing internal price

Select all that apply

☑ Navigate regulations

☑ Drive energy efficiency

☑ Set a carbon offset budget

☑ Drive low-carbon investment

☑ Conduct cost-benefit analysis

☑ Influence strategy and/or financial planning

☑ Incentivize consideration of climate-related issues in decision making

☑ Incentivize consideration of climate-related issues in risk assessment

(5.10.1.3) Factors considered when determining the price

Select all that apply

☑ Alignment with the price of a carbon tax

☑ Cost of required measures to achieve climate-related targets

☑ Price with substantive impact on business decisions

☑ Price/cost of voluntary carbon offset credits

☑ Scenario analysis

(5.10.1.4) Calculation methodology and assumptions made in determining the price

We examined the change in carbon prices prospectively under the NGFS scenarios proposed by TCFD. NGFS scenarios have been developed to provide a common point for analyzing climate risks to the economy and the financial system. They are designed as a tool to illuminate potential future risks and prepare the financial system for contingencies. NGFS scenarios are not forecasts but assess the boundaries of plausible futures for financial risk assessment. They provide an assessment to understand how climate change (physical risk) and climate policy and technology trends (transition risk) may evolve in different futures. NGFS scenarios offer features suitable for a wide range of applications. The REMIND-MAgPIE model provides comprehensive analyses to understand the role, synergies and trade-offs of various factors, in particular population, resources, technologies, policies and the environment, to guide critical decisions for sustainability. From an aviation sector perspective, these analyses can have important implications for the aviation-related environmental impacts, economic developments, and resource use of future technologies and policies. For example, strategies to reduce carbon emissions in aviation can directly impact environmental issues such as air pollution

and climate change. In addition to external sources, we also evaluated the carbon market involving 2024-eligible credits and conducted a related price analysis within this scope.

(5.10.1.5) Scopes covered

Select all that apply

☑ Scope 1

(5.10.1.6) Pricing approach used – spatial variance

Select from:

☑ Differentiated

(5.10.1.7) Indicate how and why the price is differentiated

The integration value of both mitigation technologies and advanced technologies varies regionally. Differentiation and change are foreseen by evaluating the investments made, market share and transmission coverage. Prices under the EU ETS and CORSIA vary by region, and different pricing will apply for credits obtained or to be obtained from carbon emission reduction projects. Within the scope of this assessment, the minimum and maximum shadow price value has been added to the analysis.

(5.10.1.8) Pricing approach used – temporal variance

Select from:

☑ Evolutionary

(5.10.1.9) Indicate how you expect the price to change over time

We assessed how carbon pricing in the European area is likely to evolve(which range it should be expected). According to the scenario we examined (REMINDMAgPIE 3.2-4.6-2050 net zero and Regional Shadow Carbon Price-EU), the average carbon value for 2030-2035 is expected to change to USD 25-125, respectively. According to the data announced by ICAO(CORSIA), 2021-2026, it is expected to change between 21-32 USD (worst scenario) and between 3.10-4.90 USD (normal scenario). Due to our inclusion in the EU ETS, we consider the price of carbon to navigate the GHG regulations. Internal carbon price also helps us calculate our risks arising from new regulations (CORSIA, Turkish MRV etc.). In 2024, we participated in the CORSIA-eligible credit purchasing event organized through IATA's ACE platform. By engaging with market participants and integrating the carbon credits we purchased into our 2023 assessment, we adopted a more realistic and informed approach in 2024.

(5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

775

(5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

1761

(5.10.1.12) Business decision-making processes the internal price is applied to

Select all that apply

☑ Capital expenditure

☑ Operations

☑ Risk management

☑ Opportunity management

(5.10.1.13) Internal price is mandatory within business decision-making processes

Select from:

☑ Yes, for some decision-making processes, please specify :Strategic planning and carbon price future budgeting studies

(5.10.1.14) % total emissions in the reporting year in selected scopes this internal price covers

77.5

(5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

☑ Yes

(5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

We used a shadow price range of 2.04–34.2 USD for CORSIA and 25–125 USD for EU ETS and other emerging regulations to assess their potential financial impacts. By evaluating both sets of reference values and taking into account the actual purchase prices of the credits we acquired, we determined that a reasonable shadow price range would be between 22 and 50 USD. The use of these internal carbon prices helps us to assess our climate-related transitional risks and opportunities and aids us in the decision-making process on our capital investments although the enforcement is not mandatory. By using these prices internally, we are able to assign a financial impact figure to climate related transitional risks and these figures assisted us on our fleet renewal plans with more efficient aircraft which contributes to the implementation of our climate commitment of reducing our GHG emissions / RPK by 20% until 2030. We perform our assessment of the

situation and interpretation of the expected graphs according to the regulations we are in. We update important projections such as EU ETS and CORSIA every year to assess the situation and evaluate future targets. We also disclosed clear information regarding the carbon pricing approach used in the risk and opportunity analyses shared in Section 3 of our CDP submission.
[Add row]

(5.11) Do you engage with your value chain on environmental issues?

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:
☑ Yes

(5.11.2) Environmental issues covered

Select all that apply
☑ Climate change

Customers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:
☑ Yes

(5.11.2) Environmental issues covered

Select all that apply
☑ Climate change

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

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

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ No standardized procedure

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

We created our Materiality Matrix to identify the most important risks and opportunities that affect us while developing our strategies and planning, and to prioritize these topics according to their impact on our business and performance. In the matrix, the impact of each sustainability issue for the company (financial, operational, reputational) and for stakeholders (social, environmental, economic) was evaluated. Accordingly, our report provides transparent information on issues that are important for our company and at the same time have an important impact on our stakeholders. In the advanced stages of this assessment, where our focus is on prioritizing customers and suppliers, we also plan to incorporate investors and other stakeholder units into our analysis. Even if we do not prioritize adding this aspect in the immediate future, we will still evaluate opportunities to work on incorporating other stakeholder units into our analysis.

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☑ No, and we do not plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☑ No standardized procedure

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

We created our Materiality Matrix to identify the most important risks and opportunities that affect us while developing our strategies and planning, and to prioritize these topics according to their impact on our business and performance. In the matrix, the impact of each sustainability issue for the company (financial, operational, reputational) and for stakeholders (social, environmental, economic) was evaluated. Accordingly, our report provides transparent information on issues that are important for our company and at the same time have an important impact on our stakeholders. In the advanced stages of this assessment, where our focus is on

prioritizing customers and suppliers, we also plan to incorporate investors and other stakeholder units into our analysis. Even if we do not prioritize adding this aspect in the immediate future, we will still evaluate opportunities to work on incorporating other stakeholder units into our analysis.
[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

Climate change

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☑ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☑ Contribution to supplier-related Scope 3 emissions

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☑ 26-50%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Understanding the effects related to Scope1&3 emissions are essential for identifying the most affected stakeholders.These stakeholders play a critical role in achieving carbon reduction.We are evaluating suppliers whose Scope3 emissions, and the financial impacts associated with these emissions, exceed 1% of our total Scope3 emissions.An analysis of suppliers that have a significant impact on Pegasus' sustainability strategy within the scope of the services provided by the supplier was created.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

☑ 1-25%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

75
[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to climate change

☑ Business risk mitigation

☑ Strategic status of suppliers

☑ Vulnerability of suppliers

(5.11.2.4) Please explain

In 2023, we conducted a comprehensive study to define our entire value chain(VC) and in 2024 we reassessed. We created a comprehensive stakeholder list with the contributions of all our departments and evaluated-categorized these stakeholders according to their activities, their ESG and economic impacts on our operations. With the review&approval of our top management, our value chain mapping, which covers both up&downstream value chain, was finalized&updated to include a total of 17 different groups. Our VC mapping covers all stakeholders with whom we have a direct relationship, defined as “Tier 1”. Among the suppliers Tier 1, we also evaluate our suppliers that impact our scope 3 emissions.We have also identified a specific group of stakeholders with high environmental impacts that have been identified/prioritized for impact monitoring. In the supplier analysis, a comprehensive approach was adopted, including a thorough risk assessment to identify potential

vulnerabilities&uncertainties associated with each supplier. The impact evaluation examined how risks and disruptions related to suppliers could affect overall operations. The analysis considered the necessity and vulnerability linked to suppliers for whom there are no viable alternatives, highlighting the challenges of dependency on these suppliers. The strategic importance of each supplier was also assessed to determine their role in maintaining competitive advantage and ensuring the stability of the supply chain.
[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

Climate change

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☑ Yes, environmental requirements related to this environmental issue are included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

As Pegasus Airlines, we positioned sustainability as a key component of our strategy, in line with increased awareness regarding environmental, social and economic issues affecting global development. As we carry out our business, we adopt and implement certain principles beyond regulations and standards, with the aim of maintaining the value we create for our stakeholders at the highest level. We aim to derive efficiency, incite new sustainable business models and thus increase the benefits we offer society, through collaboration. Our Sustainability Compliance Framework, providing a code of conduct, identifies areas of importance for us where we see an opportunity for further development, and further indicates our expectations from our value chain. As Pegasus Airlines, we expect our employees, our suppliers and our business partners to take our Sustainability Compliance Framework into consideration as they carry out business with us. Any violation of the principles stated in Framework may necessitate a review of our affected business relationships and the implementation of precautions. Our priority is to increase the sustainability performance of our value chain, to support our stakeholders who are willing to accompany us on this journey, to share best practices, to collaborate and to generate benefits by creating solutions for environmental and social issues.
[Fixed row]

(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Regular environmental risk assessments (at least once annually)

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ On-site third-party audit

☑ Supplier scorecard or rating

☑ Supplier self-assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 100%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:

☑ 100%

(5.11.6.12) Comment

In our contracts with suppliers, we include a compliance clause that mandates adherence to legal requirements. This expectation is a continuous necessity, ensuring that our suppliers align with all relevant regulations and standards. To support this, we require our suppliers to conduct their own risk assessments within this framework, thereby integrating compliance into their operational practices. Furthermore, we actively monitor and verify this compliance through regular audits and surveys. These measures are designed to ensure that our suppliers meet the stipulated legal and regulatory standards, and any deviations are promptly addressed. By maintaining rigorous oversight and encouraging proactive risk management, we uphold our commitment to legal compliance and operational integrity across our supply chain.
[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Adaptation to climate change

(5.11.7.3) Type and details of engagement

Financial incentives

☑ Include long-term contracts linked to environmental commitments

Innovation and collaboration

☑ Collaborate with suppliers on innovations to reduce environmental impacts in products and services

☑ Run a campaign to encourage innovation to reduce environmental impacts on products and services

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 26-50%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☑ 51-75%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Rationale for the coverage of your engagement: As part of our climate adaptation strategy, climate change mitigation efforts, and emissions reduction goals, one of the most significant actions in our Net Zero roadmap is to increase the use of Sustainable Aviation Fuel (SAF). By utilizing SAF, we achieve an average emissions reduction of approximately 80% compared to conventional fuels. To support this initiative, we engage in continuous communication with SAF producers, regulators, and distributors to facilitate incentives and support mechanisms. Through these interactions, we aim to encourage the broader adoption of SAF. Additionally, in our voluntary use of SAF, we maintain ongoing dialogue with our fuel suppliers to express our commitment and requirements. This engagement helps to ensure the sustainability and efficiency of SAF within the supply chain and reinforces our dedication to meeting our emissions reduction targets. Impact of engagement including measures of success: As a result of our engagements in the areas of sustainability and climate adaptation, we are procuring and utilizing Sustainable Aviation Fuel (SAF) from selected fuel suppliers where feasible and available. We are formalizing agreements with our Tier 1 fuel suppliers, representing 40% of our capacity for the purchase of SAF. We plan to gradually increase this percentage over time to further enhance our commitment to sustainable fuel use.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ Yes, please specify the environmental requirement :Adaptation to climate change

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Yes
[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:
☑ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing
☑ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration
☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

(5.11.9.3) % of stakeholder type engaged

Select from:
☑ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:
☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

We prefer to engage with all of our customer through our online channels in order to raise awareness about climate change and educate them about our climate change performance and strategies. The reason for selecting all of our current and potential customers for engagement activities is because our customers include anyone who travels, this creates a perfect opportunity for us to raise awareness because we believe change begins with one person. We are not measuring the impact of our guests within Scope 3 emissions. However, they represent a significant stakeholder group in assessing our environmental impact, given that they are the recipients of our services and the primary audience we seek to influence and guide in our sustainability efforts. In 2025, we published our sustainability report in which we outlined our activities, targets, and actions in 2024. This comprehensive report is aligned with the Türkiye Sustainability Reporting Standards (TSRS) and includes a detailed assessment of our climate-related risks and opportunities, including their financial implications. We had the opportunity to transparently share with our customers the actions we have taken on climate change and sustainability. As an ongoing engagement, have been publishing our CDP report on our website for many years in order to reach both our investors and our customers. We offered our customers a platform where they can contribute to the fight against climate change and offset their own flights. With this platform, our guests have the opportunity to offset the carbon emissions of their flights by investing in renewable technologies. As our customers are not limited to any group of people, it is not possible to estimate % of customers by number. But considering the social media interactions/press coverages, we would assume that we have reached all of our current and potential customers.

(5.11.9.6) Effect of engagement and measures of success

We acknowledge that we have maintained communication with all our guests and provided them with information on various matters. By sharing details about our sustainability efforts, we not only inform them about the areas we are developing but also create opportunities for them to contribute. In 2023, we launched a partnership with climate technology company CHOOOSE, allowing our guests to offset CO_2 emissions from their flights. This cooperation is not part of our own NZ roadmap, but we attach importance to the development of this cooperation as it opens a separate window of interaction with our guests on this issue. We offer our passengers who purchase tickets on our website the opportunity to offset the emissions from their flights and supporting verified climate solutions. We enable them to contribute to projects that advance climate action around the world. In 2024, we prepared a World Environment Day video to engage with our guests, communicate our actions on sustainability and the environment, and raise awareness. We have communicated Sustainability and Environment content to over 38.7 million of our guests. We also carried out many communication activities to both inform and convey our sustainability journey to our guests. Our World Environment Day communication received over 103 thousand interactions on different social media platforms.
[Add row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Pegasus holds full authority to introduce and enforce operating policies for itself or any of its subsidiaries within the business. The operational control approach has been adopted for the calculations and shared data, as these fall within the domains where Pegasus exercises complete control.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Pegasus holds full authority to introduce and enforce operating policies for itself or any of its subsidiaries within the business. The operational control approach has been adopted for the calculations and shared data, as these fall within the domains where Pegasus exercises complete control.

Plastics

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Pegasus holds full authority to introduce and enforce operating policies for itself or any of its subsidiaries within the business. The operational control approach has been adopted for the calculations and shared data, as these fall within the domains where Pegasus exercises complete control.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Pegasus holds full authority to introduce and enforce operating policies for itself or any of its subsidiaries within the business. The operational control approach has been adopted for the calculations and shared data, as these fall within the domains where Pegasus exercises complete control.
[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:
☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply ☑ No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply ☑ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ ISO 14064-1

☑ The Greenhouse Gas Protocol: Scope 2 Guidance

☑ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

☑ 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories

☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

☑ Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019

☑ Other, please specify :EPA - Supply Chain GHG Emission Factors

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

☑ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

☑ We are reporting a Scope 2, market-based figure

(7.3.3) Comment

In 2022, we started purchasing renewable energy attribute certificates as part of our emission reduction strategy. In the reporting year of 2023 and 2024, we continued to invest in renewable electricity sources by purchasing I-REC/YEK-G certificates. Therefore, we are reporting both a Scope 2, market-based figure and a Scope 2, location-based figure. As we were not able to reach the residual emission factors in the markets that we operate in, we used the location-based emission factor as a proxy to calculate market-based Scope 2 emissions.

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

☑ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

Row 1

(7.4.1.1) Source of excluded emissions

The greenhouse gas (GHG) emissions reported cover Pegasus's areas of operation, assets, and activities, excluding our Silicon Valley office in the United States. This office was established in September and consists of a single workspace for one employee. Due to the early stage of operations and the tracking mechanisms not yet being fully implemented, combined with its negligible impact, well below 1%, the Silicon Valley office has been excluded from the emissions accounting. Additionally, our subsidiary, Innovation Lab, operated throughout 2024 without any employees. Its energy consumption was limited to a shared office space and therefore was not measured separately.

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 2 (location-based)

(7.4.1.4) Relevance of location-based Scope 2 emissions from this source

Select from:

☑ Emissions excluded due to a recent acquisition or merger

(7.4.1.7) Date of completion of acquisition or merger

05/07/2024

(7.4.1.10) Explain why this source is excluded

This office was established in September and consists of a single workspace for one employee. Due to the early stage of operations and the tracking mechanisms not yet being fully implemented, combined with its negligible impact, well below 1%, the Silicon Valley office has been excluded from the emissions accounting. Additionally, our subsidiary, Innovation Lab, operated throughout 2024 without any employees. Its energy consumption was limited to a shared office space and therefore was not measured separately.
[Add row]

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

2517944.38

(7.5.3) Methodological details

Each activity data is obtained from proof documents such as invoices, etc. The obtained values are multiplied by emission factors derived from the DEFRA. TIER-1 is accepted in the calculation methods. Greenhouse gases covered include the seven (7) greenhouse gases covered by the Kyoto Protocol, EN ISO 14064-1: 2018, which are; CO2 carbon dioxide, CH4 methane, N2O nitrous oxide, NF3 nitrogen trifluorid, HFCs hydrofluorocarbons, PFCs perfluorocarbons, SF6 sulphur hexafluoride.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

4024.68

(7.5.3) Methodological details

Each activity data is obtained from proof documents such as invoices, etc. The obtained values are multiplied by the emission factors derived from IEA.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

4024.68

(7.5.3) Methodological details

Each activity data is obtained from proof documents such as invoices, etc. The obtained values are multiplied by the emission factors derived from IEA. Since 2022, we have been using market-based instruments. The market-based scope 2 emissions are calculated using location-based emission factors as a proxy.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

66529.81

(7.5.3) Methodological details

Each activity data is obtained from proof documents such as invoices, etc. Since 2021, we have been carrying out detailed Scope 3 calculations. As we weren't able to find relevant emission factors for the goods and services we purchase, base year emissions of purchasing goods and services are calculated by using the GHG Protocol Quantis Scope 3 Evaluator tool.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

14024.64

(7.5.3) Methodological details

In 2021, we have started to calculate capital goods emissions. This category includes our Airbus aircraft purchases and emission information for the aircraft we purchase is calculated by obtaining it from Airbus' CDP report for the relevant year. The emissions obtained from Airbus' CDP report divided by the total aircraft production, leading to an assumption of emissions per aircraft.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

371054.16

(7.5.3) Methodological details

Each activity data is obtained from proof documents such as invoices, etc. The obtained values are multiplied by the WTT emission factors derived from DEFRA. This refers to the Well-to-Tank (WTT) emissions of the fuel and energy-related activities in our operations.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Upstream transportation and distribution are assessed to be not relevant. Our primary activity is flight operations, and our aircraft are delivered to us through flight operations as well. The emissions resulting from flight activities are reported under Scope 1.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Waste generated in operations is assessed to be not relevant to our operations. Calculated emissions from our waste remained negligible within our total emissions. Therefore, waste is not considered a significant source of our emissions.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Business travel is assessed to be not relevant in the base year. In 2023, we started to calculate and report our business travel emissions from non-Pegasus flights, however, the share of those emissions is negligible in our scope 3 emissions. Therefore, this category is not considered a significant source of our emissions.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

5033.3

(7.5.3) Methodological details

Employee commuting is calculated using fuel use data of the shuttle service providers. Fuel invoices are directly shared by our service provider and fuel consumption is multiplied by the emission factors derived from DEFRA.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

All the upstream leased assets are controlled by Pegasus, hence their GHG emissions are reported under Scope 1 and 2.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

We do not produce any goods that would require transportation and distribution. Therefore, this category is not relevant for Pegasus.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Pegasus is a service provider company, and we do not produce any goods. Therefore, this category is not relevant.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Pegasus is a service provider company, and we do not produce any goods. Therefore, this category is not relevant.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Pegasus is a service provider company and we do not produce any goods. Therefore, this category is not relevant.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

We did not lease any of our assets in 2021.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

Pegasus does not have any franchises.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Investments are assessed to be not relevant in the base year. In 2023, we started to calculate and report our JV's emissions under this category, however, the share of those emissions is negligible (around 0.01%) in our scope 3 emissions. Therefore, this category is not considered a significant source of our emissions. As the share of these emissions are way below our significance threshold, the base-year emissions for this category are not re-calculated.

Scope 3: Other (upstream)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

No other upstream GHG emissions.

Scope 3: Other (downstream)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

0.0

(7.5.3) Methodological details

No other upstream GHG emissions.
[Fixed row]

(7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

3392871.05

(7.6.3) Methodological details

Our Gross Global Scope 1 emissions primarily consist of emissions from aircraft fuel, as well as emissions from mobile and stationary combustion and fugitive gas sources. Aircraft fuel is regularly monitored through both invoices and our digital systems. The CORSIA (ICAO) emission factor has been used for aircraft fuel. For other Scope 1 emissions, the most recent IPCC conversion and emission factors have been utilized as it is one of the most reliable sources. There is no assumption regarding Scope 1 emissions and gross emissions are calculated by multiplying activity data by emission factors.
[Fixed row]

(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

4082.97

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

940.76

(7.7.4) Methodological details

Our Gross Global Scope 2 emissions consist of emissions from electricity consumption and heating systems. Electricity consumption is monitored through invoices received from airport authorities and building owners. To calculate location-based emissions, local electricity emission factors published by the Ministry of Energy and Natural Resources were used. Since 2022, we have been also purchasing renewable energy attribute certificates within our emission targets and we have also started to report a market-based Scope 2 figure. As we were not able to reach the residual emission factors in the markets that we operate in, we used the locationbased emission factor as a proxy to calculate market-based Scope 2 emissions.
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

245149.57

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

This category includes the following expenses: - Operating expenses, - Fixed expenses, - Cargo Expenses. These 3 expense groups include different types of subcategories and all of our expenses are calculated in this category. The emissions are calculated using emission factors from The U.S Environmental Protection Agency (EPA - Supply Chain GHG Emission Factors v1.2). All invoices related to expenses are obtained directly from our suppliers and tracked accordingly. Therefore, 100% of our calculations are based on supplier data.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

12825.07

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Supplier-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

In 2024, we included 16 new A321neo Aircraft in our fleet. The GHG emissions from the production of these aircraft are a relevant source of Scope 3 GHG emissions. To calculate those GHG emissions, we gathered data from the Airbus CDP report and used supplier data to estimate the GHG emissions. The GHG emissions from the transportation of these new aircraft (aircraft delivery) are included in our Scope 1 GHG emissions.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

704293.31

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Fuel-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

To calculate this figure, we have used the Well-to-Tank (WTT) emission factors published by DEFRA (Conversion Factors 2024 Full Set for Advanced Users) for all fuel and energy-related activities including Jet-A1, diesel, gasoline, natural gas, and SAF. All these activity data (100%) obtained from our suppliers and then multiplied with WTT emission factors to calculate Scope 3 - fuel and energy-related emissions. The jet A1 accounts for more than 99% of our total fuel and energyrelated emissions. We have also calculated emissions for transmission and distribution losses for our electricity consumption in Türkiye and other countries. We used local electricity loss rates specific to Türkiye. For other countries, we used WTT emission factors obtained from DEFRA. The calculation was conducted according to the methodology outlined in the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We don't purchase any raw materials, transportation of which would have a significant impact on our Scope 3 GHG emissions. As an airline company, a significant portion of the raw materials we use are related to fuels, with Jet-A1 making up the majority. Emissions from the transportation and distribution of fuels, including JetA1, are already reported under Scope 3 – fuel and energy-related emissions. The GHG emissions from the transportation of the capital goods (airbus aircraft) purchased are included in our Scope 1 GHG emissions. On the other hand, the only transportation service we purchase is courier services between our offices and the transportation of spare parts that are used for maintenance activities. According to our operational data, those materials make up a very small portion of our main operations and are considered negligible.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

116.45

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

In 2024 we collected 100% of the waste data from our official waste declarations and waste disposal partners. We used EPA emission factors for different waste types and disposal methods to calculate our GHG emissions.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

174.56

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Supplier-specific method

☑ Fuel-based method

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

Most of the business travel of our employees is made using our aircraft and they are included in our Scope 1 GHG emissions. However, business travel with other airline companies is calculated for the first time in 2023 and in 2024 we continue to carry out calculations within the same scope and approach. Those emissions of business travel account only for 0.018% of our total Scope 3 emissions and this value is well below our threshold

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

9728.47

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Supplier-specific method

☑ Fuel-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

This category includes transportation of our employees using shuttle services and transportation of the flight crew to and from the aircraft. We have collected 100% of the fuel use data from our transportation service providers. We have used default emission factors, which is set out in the IPCC 2006 V2-TABLE 2.4, to calculate the GHG emissions. In 2023, for the first time, we also calculated and included emissions from our employees' commutes using their vehicles in this category and in 2024 we continue to carry out calculations within the same scope and approach.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We use an operational control approach to compile our GHG inventory, and as the upstream leased assets are under our control, the GHG emissions from upstream leased assets are reported under Scope 1 or 2.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Pegasus is a transportation service provider company and we don't produce any goods, therefore this category is not relevant to our operations. Transportation services we purchase are evaluated under Scope 3 Category 4 and are also assessed to be not relevant.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Pegasus is a transportation service provider company and we don't produce any goods, therefore this category is not relevant to our operations.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, not yet calculated

(7.8.5) Please explain

Pegasus is a transportation service provider company and we don't produce any goods, therefore this category is not relevant to our operations. But we provide foods and beverages with Pegasus Cafe during flight operations. We manage this emissions within waste category in scope 3, therefore breakdown emissions not yet calculated. The GHG emissions from the services we provide (emissions from the use of our Aircraft) are included in our Scope 1 and Scope 3 Category 3 GHG emissions.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Pegasus is a transportation service provider company and we don't produce any goods. There is no end-of-life treatment for the services provided. End-of-life treatment of the waste generated while performing our services is included in Scope 3-Category 5.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We did not lease any of our assets in 2024. Therefore, the GHG emissions from this category are not relevant for the reporting year.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Pegasus does not have any franchises, therefore this category is not relevant.

Investments

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

65.28

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Supplier-specific method

☑ Investment-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

In 2023, we started to calculate emissions from the companies in which we hold shares (our JV). To do this, we used the publicly available emission reports shared by our JV, and Scope 1 and Scope 2 emissions were included in the calculation to avoid double counting. Subsequently, emissions were multiplied by our ownership share (36,82%) to calculate our proportionate emissions. In 2024, emissions from our investments accounted for 65.27 t CO2e, representing only 0.006% of our total Scope 3 emissions. Therefore, this category is considered not relevant but calculated.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

We don’t have any other sources of upstream Scope 3 emissions

Other (downstream)

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

We don’t have any other sources of downstream Scope 3 emissions
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:* ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:* ☑ Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:

☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☑ Reasonable assurance

(7.9.1.4) Attach the statement

Pegasus_14064-1 Verification Report.pdf,Pegasus_14064-1 Verification Statement.pdf

(7.9.1.5) Page/section reference

Pages containing the reference year, type of verification, verified values, and emission amounts specified for the evaluation criteria: Verification Statement Pages: 1, Verification Report Pages: 1, 3 and 8

(7.9.1.6) Relevant standard

Select from:

☑ ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

100

[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Reasonable assurance

(7.9.2.5) Attach the statement

Pegasus_14064-1 Verification Report.pdf,Pegasus_14064-1 Verification Statement.pdf

(7.9.2.6) Page/ section reference

Pages containing the reference year, type of verification, verified values, and emission amounts specified for the evaluation criteria: Verification Statement Pages: 1, Verification Report Pages: 1, 3 and 8

(7.9.2.7) Relevant standard

Select from:

☑ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Reasonable assurance

(7.9.2.5) Attach the statement

Pegasus_14064-1 Verification Report.pdf,Pegasus_14064-1 Verification Statement.pdf

(7.9.2.6) Page/ section reference

Pages containing the reference year, type of verification, verified values, and emission amounts specified for the evaluation criteria: Verification Statement Pages: 1, Verification Report Pages: 1, 3 and 8

(7.9.2.7) Relevant standard

Select from:

☑ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

☑ Scope 3: Franchises
☑ Scope 3: Investments
☑ Scope 3: Capital goods
☑ Scope 3: Business travel
☑ Scope 3: Employee commuting
☑ Scope 3: Waste generated in operations
☑ Scope 3: End-of-life treatment of sold products
☑ Scope 3: Upstream transportation and distribution
☑ Scope 3: Downstream transportation and distribution
☑ Scope 3: Use of sold products
☑ Scope 3: Upstream leased assets
☑ Scope 3: Downstream leased assets
☑ Scope 3: Processing of sold products
☑ Scope 3: Purchased goods and services

☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.3.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.3.4) Type of verification or assurance

Select from:

☑ Reasonable assurance

(7.9.3.5) Attach the statement

Pegasus_14064-1 Verification Report.pdf,Pegasus_14064-1 Verification Statement.pdf

(7.9.3.6) Page/section reference

Pages containing the reference year, type of verification, verified values, and emission amounts specified for the evaluation criteria: Verification Statement Pages: 1, Verification Report Pages: 1, 3 and 8

(7.9.3.7) Relevant standard

Select from:

☑ ISO14064-3

(7.9.3.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:
☑ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

929.61

(7.10.1.2) Direction of change in emissions

Select from:
☑ Decreased

(7.10.1.3) Emissions value (percentage)

0.03

(7.10.1.4) Please explain calculation

*In 2024, we increased our purchasing of renewable electricity and purchased 6574 MWh of renewable electricity, corresponding to our whole electricity consumption except flight related electricity consumption. Our renewable electricity consumption equals to emission reduction of 3142,21 tons from our Scope 2 Market-Based GHG emissions. In 2024, we also continued to use Sustainable Aviation Fuel (SAF) in our flight operations and consumed 209.3 tons of SAF. This amount equals to emission reduction of 622.17 tons from our Scope 1 emissions. We verified our SAF emission reductions.Total emission reductions with renewable energy consumption: 3142.21. The emission reduction value is calculated as follows; 3142.21-2212.6=929,61 Global scope 1 scope 2 emissions of the previous year (2023): 3,026,896 tCO2e 929.61/3,026,896 * 100= 0.03%*

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

63051.3

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

2.08

(7.10.1.4) Please explain calculation

*The total emission reduction figure is obtained from two different emission reduction activities: Operational efficiency and Sustainable aviation fuel. Our fuel efficiency efforts in flight operation based on efficiency initiatives and system continued and the fuel savings due to the performance amounted to 19,756 tons of fuel, which represents 62,429 tons of emission reduction. We also continued to use Sustainable Aviation Fuel (SAF) in our flight operations, consumed 209,4 tons of SAF. This amount equals to emission reduction of 622.3 tons from our Scope 1 emissions. We verified our SAF emission reductions in 2024 (this reporting year). Total emission reductions: 62,429 tCO2e, 622.3 tCO2e, total: 63,051.3 Global scope 1 scope 2 emissions of the previous year (2023): 3,026,896.08 tCO2e, The emission reduction value is calculated as follows; 63,051.3 /3,026,896.08 * 100 2.08%*

Divestment

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no divestment in the reporting year.

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no acquisitions in the reporting year.

Mergers

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no mergers in the reporting year.

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

433109.24

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

14.3

(7.10.1.4) Please explain calculation

*In 2023, our gross global scope 1 and scope 2 emissions are equal to 3,026,896.08 tCO2e. In 2024, we have increased our flight operations in line with our growth strategy. Therefore, our gross global scope 1 and scope 2 emissions increased and are equal to 3,396,954.02 tCO2e in the reporting year. The total change in gross global scope 1 and scope 2 emissions from 2023 to 2024 is equal to 370,057.94 tCO2e (3,396,954.02 - 3,026,896.08) If we didn't use renewable electricity (reducing 3,142.22 tCO2e), use SAF (reducing 622.3 tCO2e) and implement efficiency measures in our flight operations (reducing 62,429 tCO2e), the total change from 2023 to 2024 (increase) would be higher. Total Emission Reduction due to our initiatives: 63,051.3 tCO2e The total increase in emissions in the absence of the emission reduction initiatives stated above would be: 370,057.94 + 63,051.3 tCO2e 2023 Total Emissions: 3,026,896.08 tCO2e Emission value % is calculated as follows: 433,109.24 / 3,026,896.08 * 100 = 14.3%*

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no significant methodology change in the reporting year.

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no boundary change in the reporting year.

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no change in physical operating conditions in the reporting year.

Unidentified

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no unidentified change in the reporting year.

Other

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There were no other changes in the reporting year.
[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:
☑ Location-based

(7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:
☑ Yes

(7.12.1) Provide the emissions from biogenic carbon relevant to your organization in metric tons CO2.

(7.12.1.1) CO2 emissions from biogenic carbon (metric tons CO2)

195.4

(7.12.1.2) Comment

Since 2022, we have used Sustainable Aviation Fuel (SAF) in some of our flights and we aim to increase the percentage of SAF usage gradually. The CO2 emissions from the combustion of sustainable aviation fuels are calculated using DEFRA scopes bioenergy emission factors and are equal to 39.40 tons of emissions. WTT emissions of SAF are included in our Scope 3 - Category 3 and are equal to 156 tons of emissions. Therefore, the total CO2 emissions from biogenic carbon is equal to 195.4 tons of emissions.
[Fixed row]

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:
☑ Yes

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

3392676.24

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:

☑ CH4

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

12.78

(7.15.1.3) GWP Reference

Select from:

☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:

☑ N2O

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

69.75

(7.15.1.3) GWP Reference

Select from:

☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 4

(7.15.1.1) Greenhouse gas

Select from:

☑ HFCs

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

112.28

(7.15.1.3) GWP Reference

Select from:

☑ IPCC Sixth Assessment Report (AR6 - 100 year)

[Add row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

Albania

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.02

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.02

Armenia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.79

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.79

Austria

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

1.22

(7.16.3) Scope 2, market-based (metric tons CO2e)

1.22

Azerbaijan

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Bahrain

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Belgium

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.18

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.18

Bosnia & Herzegovina

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

6.99

(7.16.3) Scope 2, market-based (metric tons CO2e)

6.99

Bulgaria

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.03

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.03

Croatia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Cyprus

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Czechia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

2.89

(7.16.3) Scope 2, market-based (metric tons CO2e)

2.89

Denmark

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Egypt

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

6.57

(7.16.3) Scope 2, market-based (metric tons CO2e)

6.57

Estonia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Finland

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.47

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.47

France

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

1.46

(7.16.3) Scope 2, market-based (metric tons CO2e)

1.46

Georgia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

4.57

(7.16.3) Scope 2, market-based (metric tons CO2e)

4.57

Germany

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

23.57

(7.16.3) Scope 2, market-based (metric tons CO2e)

23.57

Greece

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

2.71

(7.16.3) Scope 2, market-based (metric tons CO2e)

2.71

Hungary

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Iran (Islamic Republic of)

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

15.99

(7.16.3) Scope 2, market-based (metric tons CO2e)

15.99

Iraq

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

15.99

(7.16.3) Scope 2, market-based (metric tons CO2e)

15.99

Ireland

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Israel

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Italy

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

2.71

(7.16.3) Scope 2, market-based (metric tons CO2e)

2.71

Jordan

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

5.34

(7.16.3) Scope 2, market-based (metric tons CO2e)

5.34

Kazakhstan

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

6.53

(7.16.3) Scope 2, market-based (metric tons CO2e)

6.53

Kuwait

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

4.12

(7.16.3) Scope 2, market-based (metric tons CO2e)

4.12

Kyrgyzstan

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.38

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.38

Lebanon

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

9.58

(7.16.3) Scope 2, market-based (metric tons CO2e)

9.58

Montenegro

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Morocco

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

4

(7.16.3) Scope 2, market-based (metric tons CO2e)

4

Netherlands

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.03

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.03

North Macedonia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

4.44

(7.16.3) Scope 2, market-based (metric tons CO2e)

4.44

Norway

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Oman

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

1.5

(7.16.3) Scope 2, market-based (metric tons CO2e)

1.5

Pakistan

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

1.45

(7.16.3) Scope 2, market-based (metric tons CO2e)

1.45

Poland

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

4.37

(7.16.3) Scope 2, market-based (metric tons CO2e)

4.37

Portugal

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.46

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.46

Qatar

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

1.38

(7.16.3) Scope 2, market-based (metric tons CO2e)

1.38

Republic of Moldova

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Romania

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

1.53

(7.16.3) Scope 2, market-based (metric tons CO2e)

1.53

Russian Federation

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

3.18

(7.16.3) Scope 2, market-based (metric tons CO2e)

3.18

Saudi Arabia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

13.6

(7.16.3) Scope 2, market-based (metric tons CO2e)

13.6

Serbia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

1.44

(7.16.3) Scope 2, market-based (metric tons CO2e)

1.44

Slovakia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Spain

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

2.55

(7.16.3) Scope 2, market-based (metric tons CO2e)

2.55

Sweden

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.05

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.05

Switzerland

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.35

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.35

Turkey

(7.16.1) Scope 1 emissions (metric tons CO2e)

3392871.05

(7.16.2) Scope 2, location-based (metric tons CO2e)

3924.71

(7.16.3) Scope 2, market-based (metric tons CO2e)

782.5

Ukraine

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

United Arab Emirates

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

5.55

(7.16.3) Scope 2, market-based (metric tons CO2e)

5.55

United Kingdom of Great Britain and Northern Ireland

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0.27

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.27
[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply
☑ By business division
☑ By facility
☑ By activity

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

	Business division	Scope 1 emissions (metric ton CO2e)
Row 1	*Flights*	*3386995.18*
Row 2	*Ground Operations*	*5601.46*
Row 3	*Offices*	*112.28*
Row 4	*Headquarters*	*162.12*

[Add row]

(7.17.2) Break down your total gross global Scope 1 emissions by business facility.

Row 1

(7.17.2.1) Facility

Istanbul Aeropark Company Headquarters (Including Scope 1 GHG emissions from Aircraft)

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

3388470.61

(7.17.2.3) Latitude

40.929857

(7.17.2.4) Longitude

29.306877

Row 2

(7.17.2.1) Facility

Sabiha Gokcen Airport

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

4263.15

(7.17.2.3) Latitude

40.906473

(7.17.2.4) Longitude

29.315316

Row 3

(7.17.2.1) Facility

Izmir Adnan Menderes Airport

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

40.27

(7.17.2.3) Latitude

38.293822

(7.17.2.4) Longitude

27.151943

Row 4

(7.17.2.1) Facility

Antalya Airport

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

53.7

(7.17.2.3) Latitude

36.904361

(7.17.2.4) Longitude

30.801871

Row 5

(7.17.2.1) Facility

Ankara Airport

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

21.62

(7.17.2.3) Latitude

40.116115

(7.17.2.4) Longitude

32.99301

Row 6

(7.17.2.1) Facility

Trabzon Airport

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1.61

(7.17.2.3) Latitude

40.994339

(7.17.2.4) Longitude

39.782373

Row 7

(7.17.2.1) Facility

Kayseri Airport

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1.42

(7.17.2.3) Latitude

38.765464

(7.17.2.4) Longitude

35.482104

Row 8

(7.17.2.1) Facility

Adana Airport

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1.43

(7.17.2.3) Latitude

36.98548

(7.17.2.4) Longitude

35.297284

Row 9

(7.17.2.1) Facility

Bodrum Airport

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

11.91

(7.17.2.3) Latitude

37.244456

(7.17.2.4) Longitude

27.673032

Row 10

(7.17.2.1) Facility

Dalaman Airport

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

3.17

(7.17.2.3) Latitude

36.717369

(7.17.2.4) Longitude

28.786883

Row 11

(7.17.2.1) Facility

Other Locations (Coordinates given belong to one of the airports where we receive ground operations services)

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

2.16

(7.17.2.3) Latitude

36.941996

(7.17.2.4) Longitude

37.473998
[Add row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

Row 1

(7.17.3.1) Activity

Jet kerosene consumption

(7.17.3.2) Scope 1 emissions (metric tons CO2e)

3386955.79

Row 2

(7.17.3.1) Activity

Diesel Oil Consumption (GPU+Generators)

(7.17.3.2) Scope 1 emissions (metric tons CO2e)

1244.97

Row 3

(7.17.3.1) Activity

Gasoline Consumption (Generators)

(7.17.3.2) Scope 1 emissions (metric tons CO2e)

0.82

Row 4

(7.17.3.1) Activity

Fugitive emissions from refrigerators and air conditioners

(7.17.3.2) Scope 1 emissions (metric tons CO2e)

112.09

Row 5

(7.17.3.1) Activity

Fugitive emissions from fire extinguishers

(7.17.3.2) Scope 1 emissions (metric tons CO2e)

0.19

Row 6

(7.17.3.1) Activity

Diesel oil consumption (mobile sources)

(7.17.3.2) Scope 1 emissions (metric tons CO2e)

4324.62

Row 7

(7.17.3.1) Activity

Gasoline consumption (mobile sources)

(7.17.3.2) Scope 1 emissions (metric tons CO2e)

193.19

Row 8

(7.17.3.1) Activity

SAF Consumption (N2O and CH4 emissions)

(7.17.3.2) Scope 1 emissions (metric tons CO2e)

39.4
[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

Transport services activities

(7.19.1) Gross Scope 1 emissions, metric tons CO2e

3388241.15

(7.19.3) Comment

99.86 % of our gross global Scope 1 emissions come from our flights. These emissions include Jet kerosene/SAF consumption, fugitive emissions from fire extinguishers on the aircraft, and diesel oil consumed in the GPU unit or other equipment that are under our operational control.
[Fixed row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply
☑ By business division
☑ By facility
☑ By activity

(7.20.1) Break down your total gross global Scope 2 emissions by business division.

	Business division	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	*Flights*	*0*	*0*
Row 2	*Ground Operations*	*667.74*	*667.74*
Row 3	*Offices*	*2331.06*	*273.02*
Row 4	*Headquarters*	*1084.18*	*0*

[Add row]

(7.20.2) Break down your total gross global Scope 2 emissions by business facility.

Row 1

(7.20.2.1) Facility

Istanbul Aeropark Company Headquarters (Including 400Hz and GPU from domestic and international flights operated)

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

1751.92

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

667.74

Row 2

(7.20.2.1) Facility

Sabiha Gokcen Airport

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

1805.73

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

273.02

Row 3

(7.20.2.1) Facility

Izmir Adnan Menderes Airport

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

172.67

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 4

(7.20.2.1) Facility

Antalya Airport

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

110.7

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 5

(7.20.2.1) Facility

Ankara Airport

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

101.63

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 6

(7.20.2.1) Facility

Tranzon Airport

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

7.8

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 7

(7.20.2.1) Facility

Kayseri Airport

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

4.75

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 8

(7.20.2.1) Facility

Adana Airport

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

9.77

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 9

(7.20.2.1) Facility

Bodrum Airport

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

20.27

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 10

(7.20.2.1) Facility

Dalaman Airport

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

9.36

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 11

(7.20.2.1) Facility

Other Offices

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

88.39

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0
[Add row]

(7.20.3) Break down your total gross global Scope 2 emissions by business activity.

	Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	*Electricity Consumption*	*3142.22*	*0*
Row 2	*Central heating with natural gas*	*273.02*	*273.02*
Row 3	*400 Hz Consumption (Domestic)*	*447.61*	*447.61*
Row 4	*400 Hz Consumption (International)*	*220.14*	*220.14*

[Add row]

(7.21) Break down your organization’s total gross global Scope 2 emissions by sector production activity in metric tons CO2e.

	Scope 2, location-based, metric tons CO2e	Scope 2, market-based (if applicable), metric tons CO2e	Comment
Transport services activities	*667.741*	*667.741*	*This figure includes the GHG emissions of 400Hz electricity consumption of our aircraft.*

[Fixed row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO2e)

3392871.05

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

4082.97

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

940.76

(7.22.4) Please explain

As Pegasus, we do not have any activities with the Consolidated Accounting Group whose emissions have been included in this report. Therefore, only Scope 1 and Scope 2 emissions related to our company have been disclosed in this question.

All other entities

(7.22.1) Scope 1 emissions (metric tons CO2e)

0

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

0

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

0

(7.22.4) Please explain

As Pegasus, we do not have any activities with other entities whose emissions have been included in this report. Therefore, only Scope 1 and Scope 2 emissions related to our company have been disclosed in this question.
[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:
☑ Not relevant as we do not have any subsidiaries

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:
☑ More than 30% but less than or equal to 35%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:*

	Indicate whether your organization undertook this energy-related activity in the reporting year
	☑ Yes
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

1558.48

(7.30.1.3) MWh from non-renewable sources

12946797.44

(7.30.1.4) Total (renewable + non-renewable) MWh

12948355.92

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

6574

(7.30.1.3) MWh from non-renewable sources

0

(7.30.1.4) Total (renewable + non-renewable) MWh

6574.00

Consumption of purchased or acquired heat

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

1417.23

(7.30.1.4) Total (renewable + non-renewable) MWh

1417.23

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.4) Total (renewable + non-renewable) MWh

0.00

Total energy consumption

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

8132.48

(7.30.1.3) MWh from non-renewable sources

12948214.68

(7.30.1.4) Total (renewable + non-renewable) MWh

12956347.16
[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ Yes
Consumption of fuel for the generation of heat	*Select from:* ☑ Yes
Consumption of fuel for the generation of steam	*Select from:* ☑ No
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ No

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

1558.48

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

1558.48

(7.30.7.8) Comment

In 2024, Sustainable aviation fuel was used in our Aircraft. As it is used for transportation activities and the aircraft engines convert fuel into heat and mechanical energy respectively, it is reported under fuel consumed for heat.

Other biomass

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.8) Comment

We do not use any other biomass in our operations

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.8) Comment

We do not use any other renewable fuels in our operations.

Coal

(7.30.7.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.8) Comment

We do not use any coals in our operations.

Oil

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

12946797.44

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

12946797.44

(7.30.7.8) Comment

Jet A1 is used in our aircraft. Diesel and Gasoline are used in our ground operations and vehicles. All the oil used in mobile sources is reported under "MWh fuel consumed for self-generation of heat" Diesel oil and gasoline used in GPUs and jenerators are reported under "MWh fuel consumed for self-generation of electricity" On the other hand, some other diesel oil and gasoline, which are used in different locations, are not included in this section because they are reported under Scope 3 emissions since they are purchased as a service. Fuel disclosed under the Scope 1 emissions are reported under this question.

Gas

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.8) Comment

Natural gas is used for heating some of our offices, but the boilers are not under our control and we purchase the heat produced using natural gas, therefore it is included in our scope 2 GHG emissions and not reported under this section.

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.8) Comment

We do not use any other non-renewable fuel in our operations.

Total fuel

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

12948355.92

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

12948355.92

(7.30.7.8) Comment

Pegasus only uses Jet A1, SAF, Diesel oil, and gasoline in its operations and all types of fuels, which we use directly in our operations, are reported in this section. [Fixed row]

(7.30.9) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

Electricity

(7.30.9.1) Total Gross generation (MWh)

4610.67

(7.30.9.2) Generation that is consumed by the organization (MWh)

4610.67

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Heat

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Steam

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Cooling

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0
[Fixed row]

(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.

Row 1

(7.30.14.1) Country/area

Select from:
☑ Turkey

(7.30.14.2) Sourcing method

Select from:
☑ Unbundled procurement of energy attribute certificates (EACs)

(7.30.14.3) Energy carrier

Select from:
☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:
☑ Solar

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

6574

(7.30.14.6) Tracking instrument used

Select from:

☑ I-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Turkey

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

2017

(7.30.14.10) Comment

In 2024, we purchased 6574 MWh of renewable energy attribute certificates from YENTEK GROUP Solar power plant (SPP). The commissioning date of this plant is 2017. We used the I-REC certificate. I-REC certificates are attached to the relevant section in this report.
[Add row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Albania

(7.30.16.1) Consumption of purchased electricity (MWh)

0.5

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.50

Armenia

(7.30.16.1) Consumption of purchased electricity (MWh)

4.35

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

4.35

Austria

(7.30.16.1) Consumption of purchased electricity (MWh)

10.2

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

10.20

Azerbaijan

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Bahrain

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Belgium

(7.30.16.1) Consumption of purchased electricity (MWh)

1.09

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

1.09

Bosnia & Herzegovina

(7.30.16.1) Consumption of purchased electricity (MWh)

8.7

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

8.70

Bulgaria

(7.30.16.1) Consumption of purchased electricity (MWh)

0.75

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.75

Croatia

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Cyprus

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Czechia

(7.30.16.1) Consumption of purchased electricity (MWh)

7.75

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

7.75

Denmark

(7.30.16.1) Consumption of purchased electricity (MWh)

0.01

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.01

Egypt

(7.30.16.1) Consumption of purchased electricity (MWh)

17.18

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

17.18

Estonia

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Finland

(7.30.16.1) Consumption of purchased electricity (MWh)

6.46

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

6.46

France

(7.30.16.1) Consumption of purchased electricity (MWh)

28.62

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

28.62

Georgia

(7.30.16.1) Consumption of purchased electricity (MWh)

13.73

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

13.73

Germany

(7.30.16.1) Consumption of purchased electricity (MWh)

75.8

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

75.80

Greece

(7.30.16.1) Consumption of purchased electricity (MWh)

7.27

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

7.27

Hungary

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Iran (Islamic Republic of)

(7.30.16.1) Consumption of purchased electricity (MWh)

32.5

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

32.50

Iraq

(7.30.16.1) Consumption of purchased electricity (MWh)

6.74

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

6.74

Ireland

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Israel

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Italy

(7.30.16.1) Consumption of purchased electricity (MWh)

10.25

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

10.25

Jordan

(7.30.16.1) Consumption of purchased electricity (MWh)

13.66

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

13.66

Kazakhstan

(7.30.16.1) Consumption of purchased electricity (MWh)

11.4

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

11.40

Kuwait

(7.30.16.1) Consumption of purchased electricity (MWh)

6.7

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

6.70

Kyrgyzstan

(7.30.16.1) Consumption of purchased electricity (MWh)

6.93

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

6.93

Lebanon

(7.30.16.1) Consumption of purchased electricity (MWh)

13.55

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

13.55

Montenegro

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

10

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

10.00

Morocco

(7.30.16.1) Consumption of purchased electricity (MWh)

5.58

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

5.58

Netherlands

(7.30.16.1) Consumption of purchased electricity (MWh)

2

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

2.00

North Macedonia

(7.30.16.1) Consumption of purchased electricity (MWh)

9.68

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

9.68

Norway

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Oman

(7.30.16.1) Consumption of purchased electricity (MWh)

3.83

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

3.83

Pakistan

(7.30.16.1) Consumption of purchased electricity (MWh)

3.66

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

3.66

Poland

(7.30.16.1) Consumption of purchased electricity (MWh)

7.01

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

7.01

Portugal

(7.30.16.1) Consumption of purchased electricity (MWh)

2.48

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

2.48

Qatar

(7.30.16.1) Consumption of purchased electricity (MWh)

2.84

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

2.84

Republic of Moldova

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Romania

(7.30.16.1) Consumption of purchased electricity (MWh)

5.6

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

5.60

Russian Federation

(7.30.16.1) Consumption of purchased electricity (MWh)

8.63

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

8.63

Saudi Arabia

(7.30.16.1) Consumption of purchased electricity (MWh)

22.28

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

22.28

Serbia

(7.30.16.1) Consumption of purchased electricity (MWh)

3.15

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

3.15

Slovakia

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Spain

(7.30.16.1) Consumption of purchased electricity (MWh)

16.64

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

16.64

Sweden

(7.30.16.1) Consumption of purchased electricity (MWh)

0.12

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.12

Switzerland

(7.30.16.1) Consumption of purchased electricity (MWh)

14.45

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

14.45

Turkey

(7.30.16.1) Consumption of purchased electricity (MWh)

7510.08

(7.30.16.2) Consumption of self-generated electricity (MWh)

6574

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

1417.23

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

15501.31

Ukraine

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

United Arab Emirates

(7.30.16.1) Consumption of purchased electricity (MWh)

10.52

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

10.52

United Kingdom of Great Britain and Northern Ireland

(7.30.16.1) Consumption of purchased electricity (MWh)

0.58

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.58
[Fixed row]

(7.36) Provide any efficiency metrics that are appropriate for your organization's transport products and/or services.

Row 1

(7.36.1) Activity

Select from:
☑ Aviation

(7.36.2) Metric figure

0.0001936

(7.36.3) Metric numerator

Select from:
☑ MWh

(7.36.4) Metric denominator

Select from:
☑ Available seat.km

(7.36.5) Metric numerator: Unit total

12931746.29

(7.36.6) Metric denominator: Unit total

66808340927.24

(7.36.7) % change from last year

2.28

(7.36.8) Please explain

This figure includes only Jet A1 and SAF fuel used in our aircraft. MWh / ASK value in 2023 was 0.0001981, this value decreased by 2.28% reaching 0.0001936 in 2024. Some of our fuel efficiency initiatives that we implemented in our flight operations contributed to this figure.
[Add row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.0000303

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

3393811.81

(7.45.3) Metric denominator

Select from:
☑ unit total revenue

(7.45.4) Metric denominator: Unit total

111822522278

(7.45.5) Scope 2 figure used

Select from:

☑ Market-based

(7.45.6) % change from previous year

29.23

(7.45.7) Direction of change

Select from:

☑ Decreased

(7.45.8) Reasons for change

Select all that apply

☑ Change in renewable energy consumption

☑ Other emissions reduction activities

☑ Change in revenue

(7.45.9) Please explain

There are several reasons for this decrease: 1. The inclusion of 16 Airbus A321neo aircraft in our fleet in 2024. As these aircraft are more efficient, they have a higher passenger capacity, their fuel consumption is lower, therefore it helps us decrease our emission intensities while increasing our revenues. 2. Due to economic conditions in Türkiye our revenue has increased and it affects the denominator. 3. We have continued and increased using renewable energy attribute certificates for our Scope 2 GHG emissions.
[Add row]

(7.51) What are your primary intensity (activity-based) metrics that are appropriate to your emissions from transport activities in Scope 1, 2, and 3?

Aviation

(7.51.1) Scopes used for calculation of intensities

Select from:

☑ Report Scope 1 + 2

(7.51.2) Intensity figure

0.00005873

(7.51.3) Metric numerator: emissions in metric tons CO2e

3388908.89

(7.51.4) Metric denominator: unit

Select from:

☑ p.km

(7.51.5) Metric denominator: unit total

57702946922

(7.51.6) % change from previous year

-4.89

(7.51.7) Please explain any exclusions in your coverage of transport emissions in selected category, and reasons for change in emissions intensity.

99.70% of our Scope 1 and Scope 2 emissions come from the fuel (Jet-A1 and SAF) we use in our aircraft. While calculating GHG emissions resulting from our aviation activities, jet kerosene/SAF consumption, fugitive emissions from the on-board fire extinguishers and diesel oil consumption in our own GPU, generator, and conveyor units are included as scope 1. 400 Hz electricity consumption are included as Scope 2. The passenger km for 2024 has increased by 18% concerning 2023, our GHG emissions resulting from our flight operations have also increased by 12.23%. As a result of this, our emissions intensity per passenger-km for aviation activities has decreased by 4.89% with respect to the previous reporting period. In 2024, this emission intensity reduction rate relatively lower than the previous year.

The major reason for this is the heavy traffic conditions experienced in our main base (Sabiha Gökçen Airport), which results in higher fuel consumption. However, 16 new Airbus A321neo aircraft, which have a higher seat capacity, joined our fleet in 2024 and the change would be in the form of an increase without the efficiency provided by our new Airbus A321neo aircraft.

ALL

(7.51.1) Scopes used for calculation of intensities

Select from:

☑ Report Scope 1 + 2

(7.51.2) Intensity figure

0.00005882

(7.51.3) Metric numerator: emissions in metric tons CO2e

3393811.81

(7.51.4) Metric denominator: unit

Select from:

☑ p.km

(7.51.5) Metric denominator: unit total

57702946922

(7.51.6) % change from previous year

-4.91

(7.51.7) Please explain any exclusions in your coverage of transport emissions in selected category, and reasons for change in emissions intensity.

99.70% of our Scope 1 and Scope 2 emissions come from the fuel (Jet-A1 and SAF) we use in our aircraft. However, this figure includes all types of Scope 1 and Scope 2 emissions including mobile and stationary combustion, fugitive emissions, electricity, and heating. The passenger km for 2024 has increased by 18% concerning 2023, while our GHG emissions increased by 12.23%. As a result of this, our emissions intensity per passenger-km for aviation activities has decreased by 4.91% concerning the previous reporting period. In 2024, this emission intensity reduction rate was relatively lower than the previous year. The major reason for this is the heavy traffic conditions experienced in our main base (Sabiha Gökçen Airport), which results in higher fuel consumption. However, 16 new Airbus A321neo aircraft, which have a higher seat capacity, joined our fleet in 2024 and the change would be in the form of an increase without the efficiency provided by our new Airbus A321neo aircraft.
[Fixed row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:
☑ Energy usage

(7.52.2) Metric value

0.81

(7.52.3) Metric numerator

MWh

(7.52.4) Metric denominator (intensity metric only)

RPK

(7.52.5) % change from previous year

4.7

(7.52.6) Direction of change

Select from:

☑ Decreased

(7.52.7) Please explain

As part of our fleet transformation strategy, we aim to increase the share of fuel-efficient A320neo and Boeing MAX family aircraft, thereby improving fuel efficiency and reducing our carbon emissions. Our investments in next generation aircraft also significantly contribute to reducing the amount of energy consumed per RPK. As of the end of 2024, our energy intensity was reduced to 0.81 MJ/RPK.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☑ Intensity target

(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.

Row 1

(7.53.2.1) Target reference number

Select from:

☑ Int 1

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

12/30/2021

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

☑ Nitrogen trifluoride (NF3)

☑ Sulphur hexafluoride (SF6)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:

☑ Location-based

(7.53.2.11) Intensity metric

Select from:

☑ Grams CO2e per revenue passenger kilometer

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.13) Intensity figure in base year for Scope 1

65.92

(7.53.2.14) Intensity figure in base year for Scope 2

0.11

(7.53.2.33) Intensity figure in base year for all selected Scopes

66.0300000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

20

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

52.8240000000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

15

(7.53.2.60) Intensity figure in reporting year for Scope 1

58.79892

(7.53.2.61) Intensity figure in reporting year for Scope 2

0.07076

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

58.8696800000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

54.22

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

This target covers 100% of our Scope 1 and 2 GHG emissions. While setting our targets we have used the intensity metrics that are mainly used in the aviation industry. With this target, we aim for a reduction of 20% in our GHG emissions intensity per revenue passenger kilometer by 2030. Our main focus is to reduce the amount of emissions caused by aviation fuel use, however, we have also included Scope 2 emissions in this target. As we are one of the fastest-growing airlines, this target indicates an increase in our absolute emissions, we have predicted this increase to be about 15%.

(7.53.2.86) Target objective

As Pegasus, one of our main strategies is growing with new-generation aircraft. In this direction, we continue to grow through our new-generation aircraft. In 2023, 16 A321neo aircraft were joined in our fleet, while 2 B737-800 aircraft & 1 A320 aircraft was retired, In 2024, 16 A321neo aircraft were joined in our fleet, while 7 B737-800 aircraft & 1 A320 aircraft was retired,The key driver behind this reduction is our substantial investment in next-generation, fuel-efficient aircraft. On the other hand, the aviation sector is regulated under the frameworks such as CORSIA, ReFuelEU, etc. Therefore, another significant strategy is regarding climate change and our Net Zero target. We aim to decrease both Scope 1 and Scope 2 emissions to the zero level by 2050.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

We plan to achieve this target via renewal of our fleet. As Pegasus, one of our main strategies is growing with new-generation aircraft. Within this scope, in July 2012, we placed a firm order with Airbus for 75 firm orders and 25 optional Airbus A320/321neo aircraft. This was the largest single aircraft order in Turkish civil aviation history at the time. In December 2017, we exercised our option for 25 additional aircraft and converted these option aircraft to firm orders in A321neo configuration. In October 2021, we placed an order with Airbus for 6 additional A321neo aircraft, in June 2022, we placed an order with Airbus for 8 additional A321neo aircraft and in July 2023, we placed and order with Airbus for 36 additional A321neo aircraft. Consequently, the purchase order with Airbus has been amended to include 150 new aircraft, which now consists of 42 firm order A320neo aircraft and 108 firm-order A321neo aircraft. As part of our fleet management strategy and in addition to our current firm aircraft orders, we signed a new agreement with Boeing in December 2024 to meet our aircraft needs from 2028 onwards, covering up to 200 B737- 10 aircraft. Under this agreement, 100 B737-10 aircraft have been placed as firm orders with expected deliveries starting in 2028, and 100 additional aircraft have been secured as options that may be converted into firm orders in the future. In addition, in 2016, we became the first customer of the CFMLeap series engine used on A320neo aircraft. Significant investment in our fleet and ongoing fleet transition brings substantial advantages in reducing fuel burn. According to Airbus and Boeing, the new generation neo aircraft, compared to previous generation models (Airbus A320ceo – current engine option or Boeing 737-800NG), provides 15-20% efficiency in fuel consumption and carbon emissions. The share of the fuel-efficient new generation Airbus neo aircraft in our fleet, in terms of total seats, reached 89% as of the end of 2024.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☑ Targets to increase or maintain low-carbon energy consumption or production

☑ Net-zero targets

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

☑ Low 1

(7.54.1.2) Date target was set

12/30/2022

(7.54.1.3) Target coverage

Select from:

☑ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

☑ Electricity

(7.54.1.5) Target type: activity

Select from:

☑ Consumption

(7.54.1.6) Target type: energy source

Select from:

☑ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/30/2021

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

0

(7.54.1.9) % share of low-carbon or renewable energy in base year

0

(7.54.1.10) End date of target

12/30/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

100

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

81.5

(7.54.1.13) % of target achieved relative to base year

81.50

(7.54.1.14) Target status in reporting year

Select from:
☑ Underway

(7.54.1.16) Is this target part of an emissions target?

Our target is location-based, therefore this target is not part of an emissions target.

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

☑ No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

This target was revised in 2023 and changed from business division to organization-wide to be more ambitious. The target covers the electricity consumption in all our operations including offices and electricity consumption from our flight operations. There are no exclusions.

(7.54.1.20) Target objective

Regarding this figure, our objective is to reduce Scope 2 emissions by using renewable energy sources. This objective is directly aligned with our commitment to mitigate the environmental impact of our operations and to meet industry best practices. The target supports our long-term goal of enhancing operational efficiency while reducing carbon emissions, in line with regulatory expectations and global climate agreements. To achieve this target, we have started purchasing energy attribute certificates for our electricity use in 2022, we purchased 5,041 MWh of renewable electricity in 2023, we purchased 6,574 MWh of renewable electricity in 2024. We plan to purchase 100% of electricity consumption in our offices and operations from renewable sources, by 2030.

(7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

We plan to achieve this target by purchasing unbundled energy attribute certificates every year. We do not have the option to purchase bundled energy certificates because the majority of our electricity supplies come from 3rd parties, we do not purchase directly from the energy producer company. In the reporting year, 81.5% of electricity consumption in our offices and operations was from renewable sources and we are planning to reach 100% in 2030.
[Add row]

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☑ NZ1

(7.54.3.2) Date target was set

12/30/2021

(7.54.3.3) Target Coverage

Select from:

☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

☑ Int1

(7.54.3.5) End date of target for achieving net zero

12/30/2050

(7.54.3.6) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Sulphur hexafluoride (SF6)

☑ Nitrogen trifluoride (NF3)

☑ Carbon dioxide (CO2)

☑ Perfluorocarbons (PFCs)

☑ Hydrofluorocarbons (HFCs)

(7.54.3.10) Explain target coverage and identify any exclusions

The target covers all of our scope 1 and 2 GHG emissions from our operations company-wide. There are no exclusions. As Pegasus Airlines, minimizing the negative effects on the environment and preventing pollution within the framework of the life cycle is an integral part of our environmental policy. We also carry out monitoring, reporting and improvement work within the framework set out by national and international regulations as part of the efforts towards climate protection and combating global warming. We committed IATA's "Net Zero Carbon Emissions by 2050" resolution together with the world's leading airlines. This target was set in line with the Paris Agreement, which requires 1.5 alignment. With this commitment, we support and commit to the target of achieving net zero carbon emissions by 2050 by utilizing the opportunities provided to our sector through technological advances, with support from the energy sector and in coordination with stakeholders.

(7.54.3.11) Target objective

In line with our climate change & net zero strategy, we published our Net Zero Transition Roadmap and set some actions to achieve our target in 2023. With our "IATA Net Zero Carbon Emissions by 2050" target, we aim to reduce our scope 1 and 2 emissions with; • New aircraft technology (33%), • Operational efficiency (11%), • Regulatory offsetting (20%), • SAF (including LCAF) (36%). We also continue our efforts to align our net zero roadmap with our IATA Net Zero Target (Paris Agreement-aligned). As Pegasus, we are investing in new generation Airbus neo aircraft, which provide fuel efficiency up to 20%, and monitoring their impact on our emissions. We expect the most significant reduction will be carried out with the use of SAF (Sustainable Aviation Fuel). Additionally, we are included in international frameworks such as CORSIA, and we will offset some of our excessive emissions.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☑ Yes

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

☑ Yes, and we have already acted on this in the reporting year

(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

Select all that apply

☑ Yes, we plan to purchase and cancel carbon credits for beyond value chain mitigation

(7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target

As Pegasus, we are part of the CORSIA (Carbon Offsetting and Reduction Scheme for International Aviation) framework and will regularly offset any excess emissions within this scope. We plan to take similar actions once at the end of our target period. We also plan to implement the following milestones and near-term investments to achieve neutralization: 1. Increased Utilization of SAF: We will significantly increase the use of Sustainable Aviation Fuel (SAF) across our fleet, which is expected to play a critical role in neutralizing residual emissions. 2. Carbon Offset Programs and carbon removal: We plan to invest in verified carbon offset programs and carbon removal technologies to compensate for any remaining emissions that cannot be eliminated through operational improvements. 3. Technological Enhancements: Continued investment in advanced technologies, such as next-generation aircraft and engine upgrades, to minimize emissions as much as possible. 4. Renewable Energy Investments: We will explore and invest in renewable energy projects, such as solar and wind, to further neutralize our carbon footprint. 5.Continuous Monitoring and Reporting: We will maintain rigorous monitoring and reporting of our emissions, ensuring that we stay on track to meet our neutralization goals. These initiatives will be reviewed and adjusted as needed to ensure we achieve our carbon-neutral target by the end of the period.

(7.54.3.16) Describe the actions to mitigate emissions beyond your value chain

In addition to our efforts to reduce our operational emissions, we also prioritize expanding our impact by collaborating throughout our value chain. In this context, we continue to work in partnership with our stakeholders to manage emissions beyond our operations. We published our "Value Chain Sustainability Compliance Framework" and started to implement the "Supplier Sustainability Performance Review and Assessment Program in 2023. This framework and program covers the climate change issues and we aim to support and collaborate with our value chain to better impact. We also place importance on working beyond our value chain. We are in discussions with organizations that produce various emission reduction projects, such as offsetting, carbon capturing initiatives.

(7.54.3.17) Target status in reporting year

Select from:

☑ Underway

(7.54.3.19) Process for reviewing target

Each year, we calculate and verify our emissions in accordance with the ISO 14064-1 standard. These emission results are also publicly disclosed. We review our transition plan annually using the verified data, updating it where necessary. The updated plan is then submitted for approval by senior management and, if deemed appropriate, is re-published. Matters related to emission reduction efforts are discussed and evaluated quarterly in the relevant committees. In addition to the processing explained above, we have committed to be Net Zero by 2050 in line with the IATA sectoral target, which is aligned with the Paris Agreement, 1.5 degree. In 2023, we published our net zero roadmap for the first time, and each year we review and assess its alignment with the Paris Agreement, updating it as progress occur. This issue is of great importance to us and is also reviewed and approved by senior management
[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:
☑ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	*0*	*`Numeric input*
To be implemented	*0*	*0*
Implementation commenced	*0*	*0*
Implemented	*3*	*79267.93*
Not to be implemented	*0*	*`Numeric input*

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Transportation
☑ Company fleet vehicle efficiency

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

75503.42

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

☑ Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

58508552

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

0

(7.55.2.7) Payback period

Select from:

☑ No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ Ongoing

(7.55.2.9) Comment

In 2024 we have reduced our GHG emissions through our fuel efficiency initiatives by planning and optimizing the flights. These initiatives help us reduce fuel consumption considerably. During the reporting year, we have reduced 62,429 tons of Scope 1 GHG emissions and 13,074.42 tons of Scope 3 Category 3 GHG emissions, thus we reduced 75,503.42 tons of emissions in total through these efficiency measures. As these initiatives do not require an extra investment other than the time and effort of our employees, the investment required value is given as zero. As the investment figure is zero, the payback period is selected as "no payback" The annual monetary savings are calculated using the average price of fuel and the amount of fuel saved in kgs. The estimated lifetime of the initiative can't be calculated because these initiatives are optimization activities, and do not include any investment in new materials/machines that will have a certain lifetime. Therefore, the estimated lifetime is given as "ongoing". The annual saving value has been calculated by multiplying the amount of emissions avoided by our internal carbon price of 22 USD, and adjusted based on the exchange rate difference to reflect the value in TRY.

Row 2

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

☑ Liquid biofuels

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

622.3

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

30838000

(7.55.2.7) Payback period

Select from:

☑ No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ Ongoing

(7.55.2.9) Comment

Through our climate change and & Net Zero strategy, we continue to purchase SAF (Sustainable Aviation Fuel) for our flight operations in 2024. We purchased 209.36 tonnes of SAF and the annual CO2 saving is equal to 622.3 in our scope 1 emissions. The monetary saving, payback period, and estimated lifetime of this initiative is not an appropriate term as it is type of a biofuel that is used in our aircraft. It does not include any investment in new materials/machines that will have a certain lifetime. Therefore, the estimated lifetime is given as "ongoing". The "Investment required" figure is calculated by multiplying the amount of SAF purchase and SAF fuel price.

Row 3

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

☑ Solar PV

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

3142.21

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

59166

(7.55.2.7) Payback period

Select from:

☑ No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ <1 year

(7.55.2.9) Comment

We purchased 6574 MWh of I-REC renewable energy certificate from Solar power plant projects in Türkiye. This is a part of our goal of increasing our renewable energy consumption. The payback period is selected as no-payback as this investment does not cause any monetary savings. The payback period is also not relevant to this initiative.
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☑ Dedicated budget for energy efficiency

(7.55.3.2) Comment

We have planned the amount of the investments to be made for the fuel efficiency projects and dedicated a budget for them. However, as this information is confidential, we cannot communicate the exact amount of the budget.
[Add row]

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☑ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:

☑ Group of products or services

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ The IEA Energy Technology Perspectives Clean Energy Technology Guide

(7.74.1.3) Type of product(s) or service(s)

Aviation

☑ Geared Turbo Fan/ Ultra-High Bypass Ratio engine

(7.74.1.4) Description of product(s) or service(s)

As of the end of December 2024, 87.3% of the aircraft in our fleet are Airbus neo aircraft. The LEAP-1A engine offers A320neo and A321neo operators enhanced performance in terms of fuel consumption and CO2 emissions (15% lower) and noise (in accordance with Chapter 14). The engine found in the A320neo & A321neo aircraft, the LEAP-1A, is a high bypass ratio engine. (It has an 11:1 ratio). The bypass ratio of the CFM56-5B engine in our older Airbus ceo aircraft or the CFM56-7B engine in the B737-800 is around 5:1 or 6:1. For this reason, LEAP-1A engines in Airbus neo are called "high bypass" and provide less fuel consumption with lower emissions. A321neo Aircraft has also an additional benefit of about 25% higher passenger capacity. In 2024, 16 additional Airbus A321neo aircraft joined our fleet, while some of our less efficient aircraft were retiring.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ Other, please specify :Using own revenue passenger kilometer data for each type of aircraft in our fleet and their fuel consumption figures, we calculated gr CO2/rpk data and we made a comparison to see the efficiency of Airbus A321neo aircraft.

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Use stage

(7.74.1.8) Functional unit used

Revenue passenger km

(7.74.1.9) Reference product/service or baseline scenario used

Non Airbus NEO aircraft in our current fleet

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Use stage

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

0.00001637

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

In order to be able to make a plausible comparison we used kg of fuel emitted per revenue passenger km in each type of plane in our fleet. We calculated grCO2e per revenue passenger kilometer (rpk) for our A321neo and A320neo aircraft and other aircraft. For A321neo and A320neo aircraft average g CO2e emissions per rpk equals to 62.32 gCO2/rpk. For our other aircraft with non-high bypass ratio engines average g CO2e emissions per rpk equals to 78.69 gCO2/rpk. The avoided emissions are calculated as= 78.69-62.32 = 16.37 gCO2/rpk = 0.00001637 tCO2/rpk. As the number of neo aircraft in our fleet continues to increase each year, the percentage of our revenue generated from neo aircraft has risen from 80.7% last year to 85.8% in 2024.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

85.8
[Add row]

(7.75) Provide tracking metrics for the implementation of low-carbon transport technology over the reporting year.

Row 1

(7.75.1) Activity

Select from:

☑ Aviation

(7.75.2) Metric

Select from:

☑ Fleet adoption

(7.75.3) Technology

Select from:

☑ Other, please specify :Fuel efficient aircraft

(7.75.4) Metric figure

87.3

(7.75.5) Metric unit

Select from:

☑ Other, please specify :% of fleet

(7.75.6) Explanation

In July 2012, we placed a firm order with Airbus for 75 firm order and 25 optional Airbus A320/321neo aircraft. This was the largest single aircraft order in Turkish civil aviation history at the time. In December 2017, we exercised our option for 25 additional aircraft and converted these option aircraft to firm orders in A321neo configuration. In October 2021, we placed an order with Airbus for 6 additional A321neo aircraft, in June 2022, we placed an order with Airbus for 8 additional A321neo aircraft and in July 2023, we placed and order with Airbus for 36 additional A321neo aircraft. Consequently, the purchase order with Airbus has been amended to include 150 new aircraft, which now consists of 42 firm order A320neo aircraft and 108 firm order A321neo aircraft. In addition, in 2016, we became the first customer of the CFM-Leap series engine used on A320neo aircraft. Significant investment in our fleet and ongoing fleet transition brings substantial advantages in reducing fuel burn. According to Airbus, the new generation neo aircraft, compared to previous generation models (Airbus A320ceo – current engine option or Boeing 737-800NG), provides 15-20% efficiency in fuel consumption and carbon emissions. The share of the fuel-efficient new generation Airbus neo aircraft in our fleet, in terms of total seats, reached 87.3% as of the end of 2024.
[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☑ Yes

(7.79.1) Provide details of the project-based carbon credits retired by your organization in the reporting year.

Row 1

(7.79.1.1) Project type

Select from:

☑ Forest ecosystem restoration

(7.79.1.2) Type of mitigation activity

Select from:

☑ Emissions reduction

(7.79.1.3) Project description

As part of our ongoing commitment to environmental responsibility and in alignment with ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), Pegasus Airlines is proud to have participated in the first large-scale procurement of CORSIA-eligible Emissions Units (EEUs). Through this process, we acquired high-integrity carbon credits generated under the jurisdictional REDD+ program certified by the ART TREES standard in Guyana. Facilitated by the Aviation Carbon Exchange (ACE), and supported by the Government of Guyana, Mercuria, and Xpansiv, the event enabled airlines to procure eligible units to meet their offsetting obligations under CORSIA Phase 1, covering the compliance period of 2024–2026. Our participation in this initiative reflects not only our commitment to meeting regulatory obligations but also our broader goal of contributing to global climate solutions in a meaningful and responsible manner.

(7.79.1.4) Credits retired by your organization from this project in the reporting year (metric tons CO2e)

0

(7.79.1.5) Purpose of retirement

Select from:

☑ Compliance with a carbon pricing system

(7.79.1.6) Are you able to report the vintage of the credits at retirement?

Select from:

☑ Yes

(7.79.1.7) Vintage of credits at retirement

2021

(7.79.1.8) Were these credits issued to or purchased by your organization?

Select from:

☑ Purchased

(7.79.1.9) Carbon-crediting program by which the credits were issued

Select from:

☑ TREES (The REDD+ Environmental Excellence Standard)

(7.79.1.10) Method the program uses to assess additionality for this project

Select all that apply

☑ Standardized Approaches

(7.79.1.11) Approaches by which the selected program requires this project to address reversal risk

Select all that apply

☑ Monitoring and compensation

(7.79.1.12) Potential sources of leakage the selected program requires this project to have assessed

Select all that apply

☑ Activity-shifting

(7.79.1.13) Provide details of other issues the selected program requires projects to address

Carbon credits sourced from REDD+ (Reducing Emissions from Deforestation and Forest Degradation) projects play a vital role in global climate mitigation efforts, particularly in forest-rich developing countries. These credits are recognized under the CORSIA framework when they meet the eligibility criteria set by ICAO, ensuring environmental integrity, transparency, and permanence. By supporting activities such as forest conservation, sustainable forest management, and the enhancement of carbon stocks, REDD+ credits contribute directly to reducing greenhouse gas emissions at scale. Their inclusion in offsetting programs like CORSIA not only incentivizes the protection of critical forest ecosystems but also provides a credible and verifiable pathway for aviation stakeholders to meet their climate obligations. The use of REDD+ credits, when properly vetted and verified, reflects a science-based and internationally accepted approach to achieving net-zero targets in the aviation sector.

(7.79.1.14) Please explain

As part of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) developed by the International Civil Aviation Organization (ICAO), Türkiye has been participating voluntarily since 2021. In accordance with the requirements of CORSIA Phase 1 (2024–2026), we are obligated to report emissions from international flights and to offset emissions arising from flights between other participating states. To fulfill these obligations, a total of 35,748 carbon credits have been purchased. These credits originate from Guyana, one of the sources approved under the ICAO's CORSIA Eligible Emissions Units criteria. While these credits have been acquired, they have not yet been retired, as retirement can be executed at any point within the designated three-year phase. Accordingly, the number of retired units currently stands at zero.
[Add row]

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:
☑ No

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

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Continuously

(9.2.3) Method of measurement

The amount of water purchased and delivered through invoices refers to the total volume of water.

(9.2.4) Please explain

Water withdrawal invoices are conducted to our related department. These datas obtained from invoices tracked, archieved and reported continuously.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

The amount of water purchased and delivered through invoices refers to the total volume of water (by operating areas)

(9.2.4) Please explain

Water withdrawal invoices are conducted to our related department. These datas obtained from invoices tracked, archieved and reported continuously.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Quarterly

(9.2.3) Method of measurement

In our operations, water withdrawals are supplied by third parties from municipal potable water treatment plants and water quality is controlled and audited in compliance with local environmental regulation. In addition to local regulations, we also analyze water quality periodically.

(9.2.4) Please explain

In our operations, water withdrawals are supplied by third parties from municipal potable water treatment plants and water quality is controlled and audited in compliance with local environmental regulation. In addition to local regulations, we also analyze water quality periodically.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Our water usage, apart from aircraft washing, includes domestic use (office activities), and this water is directed to the sewage system (third party). Legally, there is no additional location that we need to monitor separately.

(9.2.4) Please explain

In our operations, most of our supplied freshwater is delivered to a third party directly. We assume only 2% of our all supplied freshwater may evaporate during aircraft wash. Therefore, 98% of our freshwater corresponds to our water discharges.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Region and usage tracking are carried out based on the information provided through invoices and purchases.

(9.2.4) Please explain

In our operations, most of our supplied freshwater is delivered to a third party directly. We assume only 2% of our all supplied freshwater may evaporate during aircraft wash. Therefore, 98% of our freshwater corresponds to our water discharges.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Continuously

(9.2.3) Method of measurement

Water directly discharged to third parties. Third parties are responsible for advancing the process. They handle the monitoring and control of the process.

(9.2.4) Please explain

Since water treatment is carried out by third parties, we ensure that all necessary obligations are met when delivering water to these third parties. The quality and treatment standards are evaluated and managed by the third party responsible for the treatment process.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

Due to the discharge of our water withdrawals into the sewage system, treatment method is not relevant within the scope of our operations. Discharge quality is controlled by municipal wastewater treatment plants in compliance with local environmental regulations and we are not responsible for controlling emissions to water

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

Due to the discharge of our water withdrawals into the sewage system, emission to water is not relevant within the scope of our operations. Regarding the discharge quality, emissions such as nitrates, phosphates, pesticides, etc. are controlled by municipal wastewater treatment plants in compliance with local environmental regulations and we are not responsible for controlling emissions to water.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

Due to the discharge of our water withdrawals into the sewage system, temperature is not relevant within the scope of our operations. Regarding the discharge quality,parameters such as temperature is controlled by municipal wastewater treatment plants in compliance with local environmental regulations and we are not responsible for controlling emissions to water.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Our calculation methodology is defined as follows: Consumption = Withdrawal - Discharge.

(9.2.4) Please explain

In our operations, the majority of the supplied freshwater is directed straight into the sewage system. We estimate that only 2% of the supplied freshwater evaporates during aircraft washing, and this percentage represents our water consumption. Our calculation methodology is defined as follows: Consumption Withdrawal - Discharge.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

There is not any water recycling systemin our facilities and it is not necessary when we consider our operations are quite less water intensity. Therefore, water recyled/used is not relevant.

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

As pegasus, we provide WASH services to our all workers, and we periodically audit sanitation and hygiene in relation to water within the scope of our periodic OHS audits.

(9.2.4) Please explain

As pegasus, we provide WASH services to our all workers, and we periodically audit sanitation and hygiene in relation to water within the scope of our periodic OHS audits.
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

14.4

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

Water usage consists of domestic use (office activities, etc.) and aircraft washing. Withdrawal values have decreased by %17.1 compared to the previous year. This decrease has been observed due to operational efficiency activities. Based on the threshold values we evaluate, we have determined that this change is classified as "about the same": Much lower/Much higher: /- 50% or more Lower/Higher: 25-50% About the same: 0-25%

Total discharges

(9.2.2.1) Volume (megaliters/year)

14.11

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

Water usage consists of domestic use (office activities, etc.) and aircraft washing. Withdrawal values have decreased by %17.1 compared to the previous year. This decrease has been observed due to operational efficiency activities. Based on the threshold values we evaluate, we have determined that this change is classified as "about the same": Much lower/Much higher: /- 50% or more Lower/Higher: 25-50% About the same: 0-25%

Total consumption

(9.2.2.1) Volume (megaliters/year)

0.29

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.2.4) Five-year forecast

Select from:

☑ About the same

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

We receive and report our water consumption separately using the tracking dashboard. This allows us to obtain more meaningful and reliable data. The consumption value is considered as the amount lost or unaccounted for during aircraft washings. The calculation method is as follows: Withdrawal - Discharge Consumption. [Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:

☑ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

14.35

(9.2.4.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.4.5) Five-year forecast

Select from:

☑ About the same

(9.2.4.6) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

99.65

(9.2.4.8) Identification tool

Select all that apply

☑ WRI Aqueduct

(9.2.4.9) Please explain

We conducted WRI Aqueduct water stress mapping. According to this assessment, the water regions where we use water outside of our Trabzon Airport operations fall into the "high" and "extremely high" water stress categories. Based on this assessment, we have included data from areas outside of Trabzon where we conduct operational activities, as these areas are identified as having water risk. As water use is expected to change at the same rate in the coming years, water withdrawals from risk areas are not expected to increase.
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

This scope is not relevant to us as we do not produce any products and solely provide passenger flight services. We only supply water from third parties and do not use any other water sources for our operations. Therefore, as we do not draw fresh water from any natural or water sources, this issue has not been considered and is deemed not applicable.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

This scope is not relevant for us as we do not produce any products and we only provide passenger flight services as an operation. We only supply water from third parties and we do not use any other water source for our operations. As we do not use brackish or seawater, this scope is deemed not relevant to us.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

We source water from third parties and do not engage in water-intensive practices within our service scope.This scope is deemed not relevant to us as we do not use groundwater and we do not produce any products and solely provide passenger flight services.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

We source water from third parties and do not engage in water-intensive practices within our service scope.This scope is deemed not relevant to us as we do not use groundwater and we do not produce any products and solely provide passenger flight services.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

This scope is not relevant for us as we do not produce any products and we only provide passenger flight services as an operation. We only withdraw water from third parties and we do not use any other water source for our operations.

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

14.4

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

We only withdraw water from third parties and we do not use any other water source for our operations. Our total water withdrawal comes from third party sources. [Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

This scope is not relevant to us as we do not produce any products and solely provide passenger flight services. We only discharge water to third parties and do not use any other water sources for our operations. Therefore, as we do not discharge to fresh water or any natural water sources, this issue has not been considered and is deemed not applicable.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

This scope is not relevant for us as we do not produce any products and we only provide passenger flight services as an operation. We only discharge water to third parties and we do not use any other water source for our operations. As we do not discharge to brackish or seawater, this scope is deemed not relevant to us.

Groundwater

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

We source water from third parties and do not engage in water-intensive practices within our service scope.This scope is deemed not relevant to us as we do not discharge to groundwater and we do not produce any products and solely provide passenger flight services.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

14.11

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.8.5) Please explain

Water usage consists of domestic use (office activities, etc.) and aircraft washing. Discharge values have increased by %17.1 compared to the previous year. This increase has been observed due to operational growth. Based on the threshold values we evaluate, we have determined that this change is classified as "about the same": Much lower/Much higher: /- 50% or more Lower/Higher: 25-50% About the same: 0-25%
[Fixed row]

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

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

As we source water from third parties and provide it for our services, the responsibility for water treatment and quality lies with these third parties. We ensure that the treatment processes meet the expected standards and required conditions by closely monitoring these practices. Since the treatment is managed by external parties, we do not conduct separate water treatment processes ourselves. Therefore, the issue related to water treatment outlined in this scope is deemed not relevant to our operations.

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

As we source water from third parties and provide it for our services, the responsibility for water treatment and quality lies with these third parties. We ensure that the treatment processes meet the expected standards and required conditions by closely monitoring these practices. Since the treatment is managed by external parties, we do not conduct separate water treatment processes ourselves. Therefore, the issue related to water treatment outlined in this scope is deemed not relevant to our operations

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

As we source water from third parties and provide it for our services, the responsibility for water treatment and quality lies with these third parties. We ensure that the treatment processes meet the expected standards and required conditions by closely monitoring these practices. Since the treatment is managed by external parties, we do not conduct separate water treatment processes ourselves. Therefore, the issue related to water treatment outlined in this scope is deemed not relevant to our operations.

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

As we source water from third parties and provide it for our services, the responsibility for water treatment and quality lies with these third parties. We ensure that the treatment processes meet the expected standards and required conditions by closely monitoring these practices. Since the treatment is managed by external parties, we do not conduct separate water treatment processes ourselves. Therefore, the issue related to water treatment outlined in this scope is deemed not relevant to our operations.

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

14.11

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ About the same

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 100%

(9.2.9.6) Please explain

We source water from third-party suppliers and deliver it to third-party recipients. The responsibility for water treatment and ensuring the required quality of water falls on these third parties. Since there has been no significant change in this arrangement compared to the previous year, it is evaluated as "about the same." The assessment scales for this evaluation are shared below: Much lower/Much higher: /- 50% or more Lower/Higher: 25-50% About the same: 0-25%

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

As we source water from third parties and provide it for our services, the responsibility for water treatment and quality lies with these third parties. We ensure that the treatment processes meet the expected standards and required conditions by closely monitoring these practices. Since the treatment is managed by external parties, we do not conduct separate water treatment processes ourselves. Therefore, the issue related to water treatment outlined in this scope is deemed not relevant to our operations.
[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:
☑ No, we have assessed this value chain stage but did not identify any facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.4) Please explain

According to the WRI Aqueduct assessment, our water withdrawals occur in areas experiencing water stress. However, water is not an indispensable resource for the execution of our operations, and the identified dependencies, impacts, and risks fall below our substantive definition thresholds. Therefore, we have responded to this question by stating that dependencies and impacts have not been determined/identified.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:
☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, but we are planning to do so in the next 2 years

(9.3.4) Please explain

Given that our most significant impact is related to climate, we also engage in climate-related assessments and initiatives with our suppliers. According to our initial evaluations, we do not have a supply chain that is excessively dependent on water. Since we do not have a water-intensive operation and water has a very low percentage in our operation volume, we consider it important, but it is not yet among our priorities. However, we are planning to introduce an assessment process within the next two years.
[Fixed row]

(9.5) Provide a figure for your organization’s total water withdrawal efficiency.

(9.5.1) Revenue (currency)

111822522278

(9.5.2) Total water withdrawal efficiency

7765452935.97

(9.5.3) Anticipated forward trend

Since the given revenue value is in Turkish Lira (TL), we expect an increase in the efficiency value. Our business model is not water-dependent, and we do not anticipate significant impacts related to water. Therefore, due to the lack of water dependency and minimal expected impact, we anticipate an increase in the efficiency value.
[Fixed row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
	Select from: ☑ No	*This scope is not relevant for us as we do not produce any products and we only provide passenger flight services as an operation.*

[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

(9.14.1) Products and/or services classified as low water impact

Select from:

☑ No, and we do not plan to address this within the next two years

(9.14.3) Primary reason for not classifying any of your current products and/or services as low water impact

Select from:

☑ Judged to be unimportant, explanation provided

(9.14.4) Please explain

Since we are a service provider, water consumption and use is not a priority in our scope of service. We do not produce products, the use of water within the scope of the product is not relevant for us.
[Fixed row]

(9.15) Do you have any water-related targets?

Select from:

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

(9.15.3) Why do you not have water-related target(s) and what are your plans to develop these in the future?

(9.15.3.1) Primary reason

Select from:

☑ We are planning to introduce a target within the next two years

(9.15.3.2) Please explain

Since we do not have a water-intensive operation and water has a very low percentage in our operation volume, we consider it important, but it is not yet among our priorities. This is our first year of measurement. This area will also be emphasized within the scope of our reporting for the coming years.
[Fixed row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

	Actions taken in the reporting period to progress your biodiversity-related commitments
	Select from: ☑ No, we are not taking any actions to progress our biodiversity-related commitments, but we plan to within the next two years

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?
	Select from: ☑ No, we do not use indicators, but plan to within the next two years

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Not assessed

(11.4.2) Comment

No feedback has been received regarding any biodiversity non-compliance or issues within the specified operational area. Biodiversity studies have been conducted within the scope of our main base. Other designated areas have not yet been assessed.

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Not assessed

(11.4.2) Comment

No feedback has been received regarding any biodiversity non-compliance or issues within the specified operational area. Biodiversity studies have been conducted within the scope of our main base. Other designated areas have not yet been assessed.

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Not assessed

(11.4.2) Comment

No feedback has been received regarding any biodiversity non-compliance or issues within the specified operational area. Biodiversity studies have been conducted within the scope of our main base. Other designated areas have not yet been assessed.

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Not assessed

(11.4.2) Comment

No feedback has been received regarding any biodiversity non-compliance or issues within the specified operational area. Biodiversity studies have been conducted within the scope of our main base. Other designated areas have not yet been assessed.

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Not assessed

(11.4.2) Comment

No feedback has been received regarding any biodiversity non-compliance or issues within the specified operational area. Biodiversity studies have been conducted within the scope of our main base. Other designated areas have not yet been assessed.

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Yes

(11.4.2) Comment

A key component of our sustainability efforts is the protection of natural life and biodiversity. Our main operational hub, Istanbul, is a critical habitat and migration corridor for various bird species. This has dual significance for our operations: bird strikes pose safety threats and flight operations may adversely affect these species. To mitigate bird strike risks, we launched the Pegasus Wildlife Hazard Management Plan in 2021 with the support of independent consultants. We continued working on this initiative and assessing improvement areas throughout 2024, as in previous years. The effectiveness of these measures requires collaboration with airport authorities and other airlines. Accordingly, we actively participated in wildlife management efforts alongside stakeholders such as the Istanbul Sabiha Gökçen Airport operator HEAŞ, the Directorate General of Civil Aviation (DGCA), and the General Directorate of State Airports Authority (DSAA). A working group was established to coordinate efforts around the Wildlife Hazard Management Plan at Istanbul Sabiha Gökçen Airport. As of the end of 2024, 16 of 17 action items have been completed, and acoustic bird control devices have been installed and activated around the main runway. We continue to provide support through analysis, research, development, and project contributions.
[Fixed row]

(11.4.1) Provide details of your organization's activities in the reporting year located in or near to areas important for biodiversity.

Row 1

(11.4.1.2) Types of area important for biodiversity

Select all that apply

☑ Other areas important for biodiversity

(11.4.1.4) Country/area

Select from:

☑ Turkey

(11.4.1.5) Name of the area important for biodiversity

İstanbul - İstanbul Sabiha Gökçen International Airport

(11.4.1.6) Proximity

Select from:

☑ Overlap

(11.4.1.7) Area of overlap (hectares)

1070

(11.4.1.8) Briefly describe your organization’s activities in the reporting year located in or near to the selected area

Istanbul Sabiha Gökçen Airport is our main base from where we operate our flights. We perform the majority of our flight activities in this area.

(11.4.1.9) Indicate whether any of your organization’s activities located in or near to the selected area could negatively affect biodiversity

Select from:

☑ Yes, but mitigation measures have been implemented

(11.4.1.10) Mitigation measures implemented within the selected area

Select all that apply

☑ Site selection

☑ Project design

☑ Operational controls

(11.4.1.11) Explain how your organization’s activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

A key component of our sustainability efforts is the protection of natural life and biodiversity. Our main operational hub, Istanbul, is a critical habitat and migration corridor for various bird species. This has dual significance for our operations: bird strikes pose safety threats and flight operations may adversely affect these species. To mitigate bird strike risks, we launched the Pegasus Wildlife Hazard Management Plan in 2021 with the support of independent consultants. We continued working on this initiative and assessing improvement areas throughout 2024, as in previous years. The effectiveness of these measures requires collaboration with airport authorities and other airlines. Accordingly, we actively participated in wildlife management efforts alongside stakeholders such as the Istanbul Sabiha Gökçen Airport operator HEAŞ, the Directorate General of Civil Aviation (DGCA), and the General Directorate of State Airports Authority (DSAA). A working group was

established to coordinate efforts around the Wildlife Hazard Management Plan at Istanbul Sabiha Gökçen Airport. As of the end of 2024, 16 of 17 action items have been completed, and acoustic bird control devices have been installed and activated around the main runway. We continue to provide support through analysis, research, development, and project contributions
[Add row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: ☑ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Consolidation approach

☑ All data points in module 6

(13.1.1.3) Verification/assurance standard

Climate change-related standards

☑ ISO 14064-1

(13.1.1.4) Further details of the third-party verification/assurance process

Verification is to establish a reasonable level of confidence opinion on the greenhouse gas declarations specified in accordance with the requirements of EN ISO 14064-1:2018. The verification activities carried out are based on the principles of ISO 14064-3:2019 and ISO 14065:2020. During the verification process, a risk assessment was made, a sample plan and a verification plan were created, and within the framework of this planning, documents were reviewed and site visits were made.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Pegasus_14064-1 Doğrulama Beyanı.pdf

Row 2

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Climate change

☑ Waste data

☑ Carbon removals

☑ Fuel consumption

☑ Methane emissions

☑ Product footprint

☑ Energy attribute certificates (EACs)

☑ Emissions breakdown by business division

☑ Electricity/Steam/Heat/Cooling generation

☑ Electricity/Steam/Heat/Cooling consumption

☑ Base year emissions

☑ Renewable fuel consumption

☑ All data points in module 7

☑ Project-based carbon credits

☑ Emissions breakdown by country/area

☑ Renewable Electricity/Steam/Heat/Cooling generation

☑ Year on year change in absolute emissions (Scope 3)

☑ Renewable Electricity/Steam/Heat/Cooling consumption

☑ Year on year change in emissions intensity (Scope 3)

☑ Emissions reduction initiatives/activities
☑ Year on year change in emissions intensity (Scope 1 and 2)
☑ Year on year change in absolute emissions (Scope 1 and 2)

(13.1.1.3) Verification/assurance standard

Climate change-related standards
☑ ISO 14064-1

(13.1.1.4) Further details of the third-party verification/assurance process

Verification is to establish a reasonable level of confidence opinion on the greenhouse gas declarations specified in accordance with the requirements of EN ISO 14064-1:2018. The verification activities carried out are based on the principles of ISO 14064-3:2019 and ISO 14065:2020. During the verification process, a risk assessment was made, a sample plan and a verification plan were created, and within the framework of this planning, documents were reviewed and site visits were made.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Pegasus_14064-1 Doğrulama Beyanı.pdf
[Add row]

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

(13.2.1) Additional information

In addition to the information we share in CDP, we also include our 2024 Sustainability Report, which presents our efforts in sustainability, our relationships with stakeholders, and the impact and value we create in key Environmental, Social, and Governance (ESG) matters. The report explains the alignment of our strategy with the steps we have taken, and provides detailed information on our projects, goals, and initiatives in the ESG space. Our 2024 Sustainability Report has been prepared in compliance with the requirements of TSRS 1 (General Requirements for Disclosure of Sustainability-Related Financial Information) and TSRS 2 (Climate-Related Disclosures), as defined by the Turkish Public Oversight Accounting and Auditing Standards Authority (KGK), as well as the Global Reporting Initiative (GRI) Standards. Furthermore, it follows the sector-specific guidelines in Annex Volumes 60 and 61 under the TSRS framework.

(13.2.2) Attachment (optional)

pgsus-tsrs-2024-sustainability-report.pdf
[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Chief Executive Officer

(13.3.2) Corresponding job category

Select from:
☑ Chief Executive Officer (CEO)
[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:
☑ No