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1. PURPOSE AND SCOPE

The Sustainability and Environmental Policy ("the Policy") aims at ensuring that the employees of Polat Group Holding A.Ş. and its Group Companies ("Polat Group", "the Group") perform their duties in a healthy and safe work environment and at standardizing the sustainability-oriented Environmental management processes throughout the Group. The objective is to fulfill the liability for a healthy work environment and Environmental sustainability in line with this purpose.

Polat Group companies and their managers and employees must abide by this Policy.

2. ABBREVIATIONS and DEFINITIONS

Environment: shall mean the whole ecosystem that covers all living and non-living things on earth and that encompasses the fields such as air, water, soil, and vegetation.

Occupational Health and Safety (OHS): shall mean the arrangement of the employer's and employees' duties, powers, responsibilities, and rights and obligations in order to improve the existing health and safety conditions.

Carbon Footprint: shall mean the carbon dioxide equivalent of greenhouse gases emitted by a country or a corporation to atmosphere as a result of its operations.

Polat Group: shall mean the Polat Group Companies (Polat Makine, PGR, PG Kimya, İMS, and Polat Group Holding) and all personnel employed by these companies.

Sustainability: shall mean the whole set of operations conducted with an aim to define, measure, and mitigate environmental and social impacts and to support the combat against climate change.

Sustainable Development Goals: Sustainable Development Goals (SDG) is a universal call to action for the objectives to be achieved by the member states of the United Nations until the end of 2030. It focuses on the solution of social, cultural, and ecological matters consisting of 17 main headings such as exterminating hunger and poverty, combatting climate change, ensuring gender equality, and generalizing good quality education and responsible production and consumption. It entered into force in January, 2016.

The Compliance Officer: shall mean the persons that are in charge of setting the framework of compliance operations, management of a compliance program, and taking and supervision of preventive actions as per policies and procedures throughout Polat Group. The Compliance Officer shall be the Legal and Compliance Counsel.

3. GENERAL PRINCIPLES

Determination of the optimum operational principles to create a safe and healthy work environment and creation and maintenance of the sense of responsibility to protect the Environment are Polat Group's prioritized objectives.

Polat Group advocates the United Nations Global Compact¹ and Polat Group's culture has been combined with the 10 basic principles enumerated therein.

4. ENVIRONMENT AND SUSTAINABLE DEVELOPMENT

Climate change and unconscious exploitation of natural resources pose considerable threats all over the world. Wherefore, the policies and general codes of practice developed by the business world against those threats are important for ensuring and maintaining Sustainability. In this context, we have adopted the efficient use and protection of natural resources, enhancement of recycling and recovery, and design of our operations for preventing Environmental pollution as our general principles.

We, as Polat Group, are committed to complying with all laws and regulations regarding energy consumption, air pollution, water use, waste management, industrial pollution, and recycling practices. We are taking any and all actions to minimize the impacts of such practices that may have a negative impact on the Environment

¹ For more information, please refer to [United Nations Global Compact](#).

as a result of our operations. The core aspects that are prioritized within the scope of our general principles are as follows:

- a. We efficiently and effectively use the natural resources.
- b. We ensure continuity in recycling practices.
- c. We determine and bring under control any elements that may harm the environment.
- d. We make required efforts to minimize our Carbon Footprint.
- e. We train our employees to create sustainability awareness.
- f. We aim at mitigating the Environmental impacts that are attributable to our operations.
- g. We follow up innovations and advancing technology regarding environmental management.

In this context, Polat Group advocates the Sustainable Development Goals that are implemented by the United Nations.²



Moreover, we, as Polat Group, have the aim of protecting and improving the environment with our mission to respect the community.

5. OCCUPATIONAL HEALTH AND SAFETY

For Polat Group, the health and safety of employees are paramount. In this context, the core aspects that we prioritize in order to create a safe workplace environment and to act in line with the governing Occupational Health and Safety laws and regulations and in-house requirements in the places where we conduct our operations are as follows:

- a. We make efforts to take all required actions against accidents, personal injury, and other conditions that might have a negative impact on human health at the work environment.

² For more information, please refer to [United Nations Sustainable Development Goals](#).



- b. We make efforts to create and maintain a healthy and safe work environment by identifying the risks against the safety of life and property.
- c. We make regular improvements by using technological equipment that conforms to Occupational Health and Safety.
- d. We prepare our plans for and take required measures against for potential emergencies in advance. We take all measures and inspect the practicability of these measures and improve them as necessary.
- e. We, as Polat Group, organize trainings for the understanding and embracement of our Policy and aim at raising personal awareness.

6. TRAINING AND CONTINUOUS DEVELOPMENT

We organize periodic trainings for our employees regarding the destructive effects of a failure to take actions for Occupational Health and Safety and Environmental Protection. Trainings are planned at least once a year. Trainings are provided by OHS units and the Compliance Officer shall follow up them.

7. AUTHORITY AND RESPONSIBILITIES

All employees and managers of Polat Group companies must abide by this Policy. Polat Group's employees shall be liable to be aware of the laws and customs of any jurisdictions where Polat Group operates.

In case the local legislation that is applicable in the jurisdictions where Polat Group operates differs from this Policy, the more conservative (stricter) of them shall be deemed valid and implemented.

Information of sustainability, OHS, and Environmental operations and nonconformities, if any, shall be reported by the Compliance Officer once a year as a minimum to the Business Conduct and Compliance Committee.

Please contact the Compliance Officer should you have questions regarding this Policy.

The Compliance Officer may establish any additional measures and rules that will not be in conflict with this Policy and that will be implemented in their own department by seeking the Business Conduct and Compliance Committee's approval.

Employees are urged to contact the Polat Group's Business Conduct Reporting Line for any actual or suspected breach of this Policy or governing legislation:

Email: polatgrupetik@kpmg.com

Telephone: 0 850 281 7343

Website: www.polatgrupetik.com

Polat Group's employees and managers shall be liable to abide by this Policy and they are aware that they will undergo investigations and sanctions in case of a breach.

The breach of this Policy by a manager or an employee may lead to serious disciplinary measures that involve dismissal.

8. RECORDS

This Policy shall be shared with employees in such locations (in printed and/or electronic media) that are easily accessible by all employees at any time. The Legal and Compliance Department shall keep the original copy hereof.



9. ENTRY INTO FORCE

This Policy enters into force under the Board of Directors Resolution dated 28.12.2023. The Legal and Compliance Department shall be responsible for considering any potential revision needs of this Policy and for revising it.