1.0 PURPOSE

The purpose of this Policy is to establish the environmental principles, commitments and targets of Naturel Holding and its Subsidiaries (Holding) in conducting their activities, with particular emphasis on environmental protection, climate change mitigation and adaptation, responsible use of natural resources, pollution prevention, protection of biodiversity and ecosystems, and continuous improvement of environmental performance.

We seek to prevent and minimize adverse environmental impacts at their source, protect human health and natural resources, and contribute to sustainable development through responsible environmental management.

2.0 SCOPE

This Policy applies to Naturel Holding and its Subsidiaries and covers all employees, operations, projects and activities under their operational control.

We seek to promote the principles of this Policy throughout our business relationships and value chain, where relevant and appropriate.

3.0 PRINCIPLES AND PRACTICES

3.1 Environmental Management System

Naturel Holding is committed to continuously improving its environmental and social performance through the effective implementation of its ISO 14001:2015 Environmental Management System and other applicable management systems.

We identify, assess, manage and monitor environmental risks and impacts associated with our activities and projects and integrate relevant environmental considerations into our business and decision-making processes.

Our environmental management approach is a dynamic and continuous process supported by management and based on regulatory compliance, risk and impact assessment, measurable objectives and targets, monitoring, employee participation, stakeholder engagement and continual improvement.

3.2 Environmental and Climate Risk Management

The Holding recognizes the importance of addressing both the causes and consequences of climate change in the countries and locations in which it operates.

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

We identify and assess material environmental and climate-related risks and opportunities associated with our operations and projects and integrate relevant mitigation and adaptation measures into our risk-management and investment processes.

Where appropriate, we engage in innovative investments and technical solutions that support low- and non-carbon investments, climate-change mitigation and adaptation, and opportunities to avoid, minimize or reduce greenhouse gas emissions.

We also support the development of climate-resilient investments and adaptation measures and seek to manage physical and transition risks arising from climate change.

Environmental Due Diligence

We conduct risk-based environmental and social due diligence, where appropriate, in connection with new investments, acquisitions, major projects and significant business relationships. The assessment may include climate, biodiversity, water, pollution, waste, land-use and other material environmental risks and impacts, with identified findings incorporated into investment decisions, integration plans, mitigation measures and ongoing environmental management.

Environmental Management in the Supply Chain

We seek to integrate environmental considerations into our procurement and supplier-management processes and communicate relevant environmental expectations to suppliers and contractors. Where material environmental risks are identified, we may apply risk-based assessment, engagement, monitoring and corrective-action measures and encourage suppliers to improve their environmental performance.

3.3 Climate Change, GHG Emissions and Carbon Management

The Holding is committed to supporting the transition toward a low-carbon economy and managing the greenhouse gas emissions associated with its activities.

In line with our long-term net-zero objectives, we measure and monitor our carbon footprint in accordance with ISO 14064 and develop initiatives aimed at reducing greenhouse gas emissions.

In line with our Environmental Policy and ISO 50001 Energy Management System, we seek to continuously improve our energy and emissions performance, including emissions associated with electricity and other energy consumption.

We invest in renewable energy, energy storage and climate technologies that contribute to the decarbonisation of energy systems and support more efficient use and integration of renewable energy.

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

We also seek to generate credible environmental attributes and carbon certificates associated with renewable energy production, where applicable, and make such instruments available to organizations seeking to address their carbon footprint, subject to applicable standards and market requirements.

The Holding is committed to respond appropriately in case the trade association of which the Holding is a member of, changes its position on climate change to become significantly weaker than or contradicting that of the Holding policy.

3.4 Our Position on Climate-Related Public Policy and Regulation

The Holding supports transparent and effective public policies that accelerate the transition toward a low-carbon and climate-resilient economy, consistent with the objectives of the Paris Agreement.

We support regulatory frameworks that facilitate the deployment and integration of renewable energy, energy storage, energy efficiency, electrification and climate technologies, while maintaining energy security, environmental integrity and supporting a just transition.

In particular, we support policies and regulatory mechanisms that encourage renewable energy investment, grid flexibility and energy storage, effective carbon pricing and emissions management, the reduction of greenhouse gas emissions and improvement of GHG efficiency, credible sustainable finance and taxonomy frameworks, transparent GHG measurement and reporting, and the development and deployment of technologies that contribute to decarbonisation.

We demonstrate our commitment to these principles through our sustainability and climate-related actions and disclosures, including the development of our Green Financing Framework, sustainability reporting, GHG measurement and disclosure, and investments in renewable energy and climate technologies.

We participate in climate- and environment-related public-policy discussions, where appropriate, directly or through industry associations and other stakeholder platforms. We seek to ensure that such engagement remains consistent with our sustainability strategy, climate commitments and long-term net-zero objectives.

Where the climate-policy position of an industry association materially differs from our own, we seek dialogue and engagement to address the misalignment and periodically reassess our participation where material differences persist.

Oversight of significant climate-related public-policy positions and engagement forms part of the Group's sustainability governance framework.

3.5 Energy and Resource Efficiency Management

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

The Holding considers energy and resource efficiency an integral part of sustainable growth and environmental management and recognizes its contribution to reducing greenhouse gas emissions and the environmental footprint of our operations.

We seek to reduce the consumption of energy, raw materials and other resources through operational efficiency, technological improvement, responsible procurement and circular-economy practices.

The Companies target to reduce resource use by 5–10% annually and improve resource efficiency by 1–5% annually, where operationally applicable.

We conduct our activities in accordance with applicable laws and regulations and take into consideration relevant energy-efficiency standards and frameworks, including Directive (EU) 2023/1791, where applicable.

3.6 Water Management

We recognize water as a shared and finite natural resource and are committed to its responsible, efficient and sustainable management across our operations. Our approach seeks to minimize water consumption, improve water-use efficiency, prevent adverse impacts on water resources and ecosystems, and appropriately manage water-related risks in the communities and locations where we operate.

Our water-management approach forms part of our ISO 14001:2015 Environmental Management System and supports the objectives of UN Sustainable Development Goal 6 – Clean Water and Sanitation.

We monitor and, where applicable, disclose water withdrawal, consumption and discharge at office and operational site level, including relevant water sources and discharge destinations. Where material to our operations, we also monitor water that is recycled, reused or returned to the environment, enabling us to better understand our water balance and identify opportunities for conservation and improved efficiency.

We aim to reduce water consumption by 2–5% annually and improve water-use efficiency by 2–3% annually, where operationally applicable. Measures may include water-efficient equipment and fixtures, preventive maintenance, leak detection and prevention, responsible operational practices, employee awareness, water reuse and recycling, and other site-specific water conservation initiatives.

We apply a risk-based approach to water management and assess the water-stress conditions of the locations in which we operate using recognized water-risk assessment methodologies.

Operations located in water-stressed areas are subject to enhanced monitoring and water-efficiency measures. We aim to improve water-use efficiency by at least 3% annually in low-to-medium water-stressed areas and by 5–7% annually in high and very high water-stressed areas, subject to local conditions and operational feasibility.

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Where material water-related risks are identified, we develop appropriate site-specific management measures and targets, taking into consideration local water availability, competing water demands, ecosystem needs and potential impacts on surrounding communities.

We seek to minimize freshwater withdrawal wherever technically and operationally feasible and prioritize opportunities to reduce, reuse and recycle water within our activities.

Water discharge is managed in accordance with applicable legal and environmental requirements. We seek to prevent the deterioration of receiving water bodies and minimize potential adverse impacts associated with the quantity and quality of discharged water.

Where feasible, we promote the use of recycled or reused water and assess opportunities to reduce reliance on freshwater resources, particularly in areas experiencing high or very high-water stress.

We seek to prevent pollution and protect surface water, groundwater and associated ecosystems from adverse impacts arising from our activities. Appropriate operational controls are implemented for the prevention and management of leaks, spills, contamination and other incidents that may affect water resources.

For projects or operations with potentially material water-related impacts, we assess such impacts as part of our environmental and risk-management processes and implement appropriate prevention, mitigation and monitoring measures.

We monitor the quality of material water discharges, where applicable, against relevant legal requirements and established discharge parameters, taking into consideration the characteristics and sensitivity of receiving water bodies.

We monitor and record material water-related incidents, including spills, leaks, unauthorized discharges, contamination events and other incidents that may adversely affect water resources. Material incidents, their environmental impacts and the corrective and preventive actions taken are investigated, documented and, where appropriate, disclosed through our ESG reporting in accordance with applicable regulatory requirements.

Water-related risks, performance and progress against established targets are monitored periodically and reviewed as part of our environmental management processes. We seek to continuously improve the quality and coverage of our water data and disclose relevant water-management performance through our sustainability and ESG reporting.

Our water-management approach and targets are periodically reviewed to reflect changes in our operations, local water conditions, regulatory requirements, stakeholder expectations and recognized environmental management practices.

CONTROLLED COPY

Prepared by:	Controlled by:	Approved by:
SUSTAINABILITY PINAR KARAMAN	QUALITY MANAGEMENT DEMET DİKMEN	CEO TOLGAY BENDERLİ

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

3.7 Biodiversity and Ecosystems

Naturel Holding is committed to protecting biodiversity, ecosystems and natural habitats and to preventing and minimizing adverse biodiversity impacts associated with its operations and projects.

For new projects, environmental assessments are conducted as applicable to identify potential impacts on biodiversity and ecosystems, and appropriate prevention, mitigation, restoration and monitoring measures are implemented in accordance with relevant environmental assessment requirements.

We apply the mitigation hierarchy of avoid, minimize, restore and, where appropriate, offset in the planning, development and operation of our projects.

Particular attention is given to projects located in or adjacent to protected areas, Key Biodiversity Areas, critical habitats and other areas of high biodiversity value.

We aim for 100% of new projects located in or adjacent to biodiversity-sensitive areas to undergo biodiversity risk and impact screening prior to final investment or development approval.

We aim for 100% of sites identified as critical or high biodiversity-risk sites to have a site-specific Biodiversity Management Action Plan within 12 months of identification.

Biodiversity performance at identified critical sites is monitored annually using relevant site-specific indicators. Where habitat restoration is required, measurable site-specific restoration targets and implementation timeframes are established and monitored.

We also seek opportunities to protect and enhance biodiversity through initiatives including afforestation and agrosolar projects, where appropriate.

Land and Soil Protection

We seek to minimize land disturbance, soil degradation, erosion and contamination associated with our projects and operations. Where land is temporarily disturbed, we implement appropriate rehabilitation and restoration measures, taking into consideration soil quality, vegetation, biodiversity and future land-use requirements.

3.8 Waste Management and Circular Economy

Due to the diverse nature of our activities, our operations may generate general, recyclable, hazardous, non-hazardous and electronic waste.

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Naturel Holding seeks to prevent and minimize waste generation and ensure that waste is appropriately segregated, stored, transported, recovered, recycled or disposed of through authorized and registered waste-management service providers in accordance with applicable requirements.

The Companies target to reduce waste by 10% annually, where operationally applicable.

We are committed to implementing circular-economy principles by designing, sourcing, operating and decommissioning our assets in a manner that prioritizes resource efficiency, waste prevention, reuse, repair, refurbishment, recovery and recycling while minimizing environmental impacts across the lifecycle of our activities.

E-Waste Management

We seek to recycle, reuse or repurpose electronic waste generated by our offices wherever possible.

Our Waste Management Sub-Committee supports the environmentally responsible management of waste and works with relevant authorities and authorized service providers for the appropriate handling and recycling of electronic waste, including laptops, monitors, printers and other electronic equipment.

3.9 Pollution Prevention and Control

Naturel Holding and its Subsidiaries are committed to preventing and reducing pollution across our operations, projects and, where relevant, our value chain.

We seek to minimize emissions and releases to air, water and land through efficient resource use, cleaner technologies, responsible waste and chemicals management, pollution-control measures and compliance with applicable environmental legislation and standards.

We assess environmental impacts and implement appropriate measures to reduce greenhouse gas emissions, air pollutants, wastewater, waste generation and other forms of pollution and promote the use of environmentally preferable materials and processes.

Through monitoring, employee awareness, supplier engagement and continual improvement initiatives, we seek to protect ecosystems, preserve natural resources and contribute to a cleaner environment.

The Companies target to reduce pollution by 10% annually, where operationally applicable and measurable.

Air Emissions – SOx, NOx and VOCs

We seek to minimize material air pollutants associated with our activities, including SOx, NOx and volatile organic compounds (VOCs), where applicable.

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

We seek to reduce the use of sulphur-containing and fossil fuels and are progressively increasing the use of electric vehicles within our fleet, thereby contributing to the reduction of combustion-related emissions.

Regarding processes and services where no material SOx emissions are generated, we continue to monitor changes in our activities that could alter the emissions profile.

We prioritize environmentally preferable chemicals and seek to minimize the use of materials containing VOCs where technically feasible.

Chemicals and Hazardous Substances

Naturel Holding establishes appropriate controls to protect employees, communities and the environment from potential impacts associated with chemical and biological substances used or processed in the workplace.

Chemical and biological hazards associated with our activities are assessed through our risk-management processes, and appropriate preventive measures, operational controls and personal protective equipment are determined.

Noise and Vibration

We seek to manage environmental noise and vibration arising from our activities with consideration for employees, neighbouring communities and environmentally or socially sensitive receptors.

Our facilities comply with applicable regulatory noise limits, and particular consideration is given to densely populated areas and sensitive locations such as schools, hospitals and other areas requiring enhanced noise protection.

3.10 Green Office and Sustainable Transportation

Green Office

We are committed to reducing the environmental footprint associated with our offices and promoting environmentally responsible working practices.

We seek to minimize energy consumption through energy-efficient lighting and electronic equipment, promote water conservation, reduce paper consumption through digitalization, encourage waste segregation and recycling, and foster environmentally responsible behaviour among our employees.

Our Green Office practices are continuously improved in line with our environmental objectives and performance.

Sustainable Transportation

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

We implement initiatives to reduce the environmental impact of employee transportation and business travel.

We encourage measures such as carpooling, online meetings, public transportation and other lower-emission mobility alternatives, where practicable.

We also seek to increase the number and proportion of electric vehicles within our fleet, thereby reducing greenhouse gas and combustion-related air emissions.

Through employee awareness activities and Sustainability Webinars, we encourage employees to consider more sustainable transportation choices.

Through these measures, we seek to reduce the carbon footprint associated with employee commuting and transportation.

3.11 Environmental Education and Awareness

The Holding recognizes that employee knowledge, organizational culture and environmental awareness are important contributors to achieving environmental objectives.

We therefore promote environmental education, training and awareness across our organization and seek to provide employees with information and tools that enable them to contribute to our environmental commitments.

Environmental topics are also addressed through internal communication, awareness activities and Sustainability Webinars, where appropriate.

3.12 Stakeholder Engagement, Community Dialogue and Public Consultation

Our cooperation and dialogue with employees, customers, suppliers, contractors, communities, authorities and other relevant stakeholders in pursuing our environmental objectives are based on transparency, partnership and trust.

We maintain a structured stakeholder-engagement approach, where appropriate, throughout relevant phases of the project lifecycle, including development, construction and operation.

Our stakeholder and community engagement may include:

- timely and transparent disclosure of relevant project-related environmental and social information
- public consultation meetings in accordance with regulatory requirements
- accessible grievance and dispute-resolution mechanisms
- community dialogue platforms, including Community Advisory Panels where appropriate
- sharing relevant environmental monitoring outcomes

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

- communication and, where appropriate, joint development of emergency preparedness and response arrangements with local authorities and affected communities

We recognize that constructive community relationships and maintaining a social license to operate contribute to long-term sustainable value creation. Community engagement and dialogue therefore form part of our Environmental and Social Risk Management and sustainability-governance approach.

3.13 Environmental Monitoring, Performance and Reporting

The Holding monitors relevant environmental performance indicators and conducts measurements, controls and assessments in accordance with applicable environmental laws, regulations and internal management-system requirements.

We monitor and, where appropriate, audit activities and processes that have or may have significant environmental impacts.

We establish quantitative and qualitative environmental targets, where appropriate, and monitor performance and progress against these targets periodically.

Material environmental incidents are recorded, investigated and evaluated to identify their causes, environmental consequences and required corrective and preventive actions.

We seek to progressively improve the quality, consistency, completeness and coverage of our environmental data and disclose relevant environmental performance through our sustainability, ESG and other corporate reporting channels.

We record and investigate significant environmental incidents, including spills, leaks, unauthorized releases, pollution events and regulatory non-compliances. Where incidents occur, we assess their environmental impacts, identify root causes, implement corrective and preventive actions and report material incidents to relevant authorities and stakeholders in accordance with applicable requirements.

Environmental Targets and Performance

We establish quantitative environmental targets, where appropriate, based on defined baselines, relevant operational boundaries and measurable performance indicators. Progress against targets is monitored periodically, and targets are reviewed to reflect changes in operational performance, environmental risks, regulatory requirements and recognized environmental management practices.

3.14 Regulatory Compliance and International Standards

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

Naturel Holding and its Subsidiaries are committed to complying with applicable environmental laws, regulations, permits and other legal requirements in the jurisdictions in which they operate.

Our projects are developed, as applicable, in alignment with relevant Turkish legislation and regulations, including:

- Turkish Environmental Law No. 2872
- Article 56 of the Constitution of the Republic of Türkiye
- Climate Law No. 7552
- Soil Conservation and Land Use Law No. 5403
- Environmental Impact Assessment Regulation (ÇED Yönetmeliği), including mandatory Public Participation Meetings (Halkın Katılımı Toplantıları), where applicable
- other relevant environmental, sectoral and permitting requirements applicable to our activities and renewable-energy projects

For relevant projects, Environmental and Social Impact Assessment (ESIA/ÇSED) processes are conducted where required to systematically identify, assess, prevent, mitigate and monitor environmental and social risks and impacts.

Where applicable, we assess our eligible economic activities against the EU Taxonomy environmental objectives, Technical Screening Criteria, Do No Significant Harm (DNSH) requirements and Minimum Safeguards to support transparent and credible sustainable finance and environmental reporting.

In addition to applicable national requirements, we seek alignment, where relevant, with internationally recognized environmental and sustainability principles, standards and frameworks, including:

- ISO 14001 Environmental Management System
- ISO 50001 Energy Management System
- ISO 14064 Greenhouse Gas Accounting
- ICMA Green Bond Principles, particularly in relation to environmental and social risk management, transparency and reporting
- IFC Performance Standards on Environmental and Social Sustainability, where applicable, including Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts and Performance Standard 4 on Community Health, Safety and Security.

3.15 Scarce Resource Use Risk Management

Holding assesses environmental, social and operational risks arising from the use of scarce resources such as water, critical minerals, raw materials and other finite natural resources in its operations. These assessments consider resource availability, continuity of supply, water stress, pressures on ecosystems and local communities' access to essential resources. To prevent and mitigate identified risks, the Company supports

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.

resource efficiency, responsible sourcing, reuse and recycling, the use of suitable alternative materials and circular economy practices. It monitors resource use and takes appropriate measures in regions and supply chains vulnerable to resource scarcity, with the aim of continually improving its practices.

4.0 REVIEW OF POLICY

This Environmental Policy is reviewed at least annually with the Corporate Governance Committee to evaluate its effectiveness, assess changes in environmental risks, regulatory requirements, operations and stakeholder expectations, and identify necessary improvements.

CONTROLLED COPY

This document is the intellectual property of NATUREL HOLDING. Reproduction or distribution to third parties without the written consent of the Quality Management Department is prohibited. Controlled distribution is carried out electronically. Printed copies are considered uncontrolled copies.