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Document No	POL.GEO.001
First Release	09.03.2026
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GEOTHERMAL ENVIRONMENTAL RISK MANAGEMENT POLICY



1.0 PURPOSE

The purpose of this policy is to define the principles, responsibilities, and control mechanisms implemented by Naturel Holding and its subsidiaries (the Holding) to identify, monitor, prevent, and mitigate environmental risks associated with geothermal exploration, drilling, production, and reinjection activities carried out in projects financed by the Holding.

This policy ensures compliance with applicable national legislation, international environmental standards, and the EU Taxonomy environmental safeguards.

2.0 SCOPE

This policy applies to:

- All geothermal power plants operated by Naturel Holding and its subsidiaries
- Exploration and drilling activities
- Production and reinjection operations
- Contractors and suppliers involved in geothermal activities

3.0 PRINCIPLES and PRACTICES

3.1 APPLICABLE LEGISLATION

Geothermal activities conducted by the Company comply with applicable Turkish national legislation, including but not limited to:

- Turkish Geothermal Resources and Natural Mineral Waters Law (Law No. 5686)
- Environmental Law (Law No. 2872)
- Environmental Impact Assessment (EIA) Regulation
- Water Pollution Control Regulation
- Soil Pollution Control and Contaminated Sites Regulation
- Waste Management Regulation
- Regulation on Control of Industrial Air Pollution
- Occupational Health and Safety Law (Law No. 6331)

3.2 KEY ENVIRONMENTAL RISKS AND MITIGATION MEASURES

3.2.1 Seismic Risk and Fault Line Proximity

Geothermal activities may potentially induce seismicity due to drilling and reinjection operations. To manage this risk, the Company implements the following measures:

Site Assessment and Selection

- Geological and geophysical surveys are conducted before project development.

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- Proximity to major fault lines is evaluated during the exploration phase.

Seismic Monitoring

- Continuous microseismic monitoring systems are installed where required.
- Data is monitored to detect any abnormal seismic activity.

Operational Controls

- Reinjection pressures and flow rates are managed to prevent induced seismicity.
- Operational parameters are adjusted when abnormal seismic signals are detected.

Risk Mitigation Plans

- Emergency response and mitigation procedures are established.

Seismic monitoring results are periodically reviewed by technical experts.

3.2.2 Soil and Groundwater Contamination

Geothermal fluids may contain dissolved minerals and gases that could potentially contaminate soil and groundwater if not properly managed.

The Company applies the following control measures:

Well Design and Integrity

- Multi-layer well casing and cementing systems are used to prevent leakage.
- Well integrity tests are conducted regularly.

Closed-loop Fluid Management

- Geothermal fluids are transported through closed pipelines to prevent environmental exposure.

Reinjection Systems

- Produced geothermal fluids are reinjected into the reservoir in accordance with regulatory requirements to maintain reservoir sustainability and prevent surface discharge.

Water Stream Management

- Production water and flowback fluids are handled in accordance with waste and water management regulations.

Spill Prevention

- Secondary containment systems are installed where necessary.
- Spill response procedures are implemented.

3.3 MONITORING AND ENVIRONMENTAL MANAGEMENT

Environmental monitoring activities include:

- Groundwater monitoring where required

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- Soil protection measures
- Monitoring of geothermal fluid handling systems
- Monitoring of reinjection operations
- Periodic environmental inspections

Monitoring results are documented and reviewed as part of the Company's Environmental Management System.

3.4 GOVERNANCE AND RESPONSIBILITY

Environmental risk management for geothermal operations is overseen by:

- Environmental Management Unit
- Health, Safety and Environment (HSE) Department
- Operational Management
- Green Financing Working Group

Where necessary, external geological, environmental, and technical experts may be consulted.

3.5 COMPLIANCE AND REPORTING

All geothermal projects financed under the Green Financing Framework shall:

- Comply with applicable environmental legislation
- Implement environmental mitigation measures
- Maintain documentation supporting environmental risk management

provide environmental data and monitoring results for ESG and Green Financing reporting

3.6 REVIEWING OF POLICY

This policy shall be reviewed periodically or when regulatory changes occur to ensure continued alignment with:

- National legislation
- International environmental standards
- EU Taxonomy environmental requirements
- The Company's Green Financing Framework.

4.0 REVISION HISTORY

Revision No	Rev. Date	Revised Titles	Explanations
00	09.03.2026	-	Initial release

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