1.0 PURPOSE

The purpose of this policy is to establish the commitments and targets of Naturel Holding and its Subsidiaries (Holding), and to define the governance, assessment criteria, and implementation requirements for all existing and new projects financed under the Company's Green Financing Framework ("Investments"), including the procedures to assess EU Taxonomy eligibility and alignment.

2.0 SCOPE

The Policy ensures that the investment principles are aligned with relevant local laws, regulations, ILO, UNGC and UN WEPs, company policies, values and ESG principles, CSRD, OECD Guidelines, as well as compliance with EU Taxonomy regulation and delegated acts. The policy governs all Naturel Holding subsidiaries, their stakeholders, including but not limited to employees, customers suppliers and business partners, intermediaries, contractors and all third-party companies with the company engages in business conduct.

3.0 PRINCIPLES and PRACTICES

Our Environmental Policy consists of the following items:

ESG Alignment:

Investments shall be aligned with the Company's Environmental, Social and Governance (ESG) principles and applicable regulatory requirements. This includes compliance with the EU Taxonomy Regulation, relevant delegated acts, and adherence to Minimum Safeguards as defined therein, and integration of environmental, social, governance, climate risk, and human rights considerations into investment decision-making.

We benchmark local legal compliance against the EU legislative requirements referenced by the EU Taxonomy through an internal equivalency mapping led by the Legal & Compliance function, and where differences exist, we apply the stricter requirement.

Each investment shall be subject to ESG screening and due diligence to ensure it contributes to substantial sustainable outcomes, avoids significant environmental harm (DNSH), respects internationally recognized human rights standards, and is supported by appropriate governance controls. Investments that fail to meet these ESG alignment requirements shall not be approved or financed under the Company's funding programs.

EU Taxonomy Alignment:

Where invested assets are EU Taxonomy aligned, the Subsidiaries ensure to undertake all requirements as per all EU laws, EU Taxonomy Regulation and applicable delegated acts, including (as relevant the Climate Delegated Act, Complementary Climate Delegated Act, and Environmental Delegated Act), regulations, directives and decisions governing: climate adaptation, transition to circular economy, prevention or mitigation of any impacts of air, water including marine water, soil, noise pollution, carbon emissions and other polluting emissions, protection and restoration of biodiversity and ecosystems, prevention of human rights violations across the value chain including all stakeholders as per our commitments set out in Environmental Policy and Ethical Policy.

EU Alignment assessment ensures that the investment projects meet the three conditions: Substantial Contribution to at least One Environmental Objective, Do No Significant Harm (DNSH) to the other environmental objectives, and compliance with Minimum Safeguards, including Human Rights Due Diligence (HRDD), as well as Climate Adaptation objectives: Integrate Climate Risk and Vulnerability Assessment (CRVA), Meet EU Taxonomy Technical Screening (TSC) Implementation of Adaptation Measures, Documentation and monitoring.

Operational Integration:

That companies' policy, process, procedure documents reflect the required criteria for alignment and compliance with local laws and regulations, as well as EU taxonomy and continuously works to update these as and when necessary.

Together with Early Detection of Risk Committee, the Green Financing Working Group integrates any climate related risk in risk inventory list, and the Group works to develop mitigation and adaptation strategies in relation to any new investment categories.

Internal Audit shall periodically review and independently assess the effectiveness of EU Taxonomy alignment and ESG integration within the investment assessment process, to ensure regulatory compliance, completeness of evidence, consistency of TSC/DNSH application, and integrity of green financing allocations.

Governance:

Green Financing Working Group (the "Group") evaluates and selects eligible investments ("Eligible Green Projects") to ensure they meet the eligibility criteria and implemented according to governing laws, regulations including EU taxonomy.

The responsibilities include Validation of EU Taxonomy alignment; Approval of DNSH assessments, Overseeing HRDD compliance; Reviewing of Climate Risk & Vulnerability Assessments; Approval of allocation of proceeds, and, Overseeing impact reporting.

The Group assesses each project separately, ensuring their specific alignment with EU Taxonomy criteria set by EU laws, regulations, directives are met. The Group documents the Taxonomy activity mapping, (whether the Investment is Taxonomy-eligible and/or Taxonomy-aligned, and the basis and evidence for that conclusion.

The Group has the authority to appoint external technical, environmental and legal consultants when necessary.

Reviewing of Policy:

We review our Green Financing Investment Assessment and Implementation Policy with the Group and Corporate Governance Committee once a year, to reflect the changes in the laws/regulations, to evaluate its effectiveness and to make necessary improvements.

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