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Integration of ESG Risks into the Internal Control System and Internal Audit Plans

1. General Framework

Within Naturel Holding, ESG risks are defined within the scope of the Corporate Risk Management methodology, linked to risk appetite, and managed in an integrated manner with Quality Management Systems and internal audit processes.

ESG risks are included in the risk inventory under sustainability headings. For each risk:

- Risk owner,
- Impact category (operational, financial, legal, reputational),
- Probability/Impact score,
- Risk Status, prioritisation,
- Mitigation plans,

are determined within the scope of the assessment.

2. Within the Scope of Internal Control

ESG	Risk Alanları	Checkpoints:	Test Activities:
Environmental Risks (E)	**Climate Change – Transition Risks**	• Regulatory compliance assessment • Carbon intensity and energy efficiency measurements • Environmental impact assessment reports • Suitability analysis of low-carbon investments • Risk assessment studies	• Data validation of carbon emissions data • Environmental reporting data traceability
	Physical Climate Risks	• Business continuity plan • Insurance coverage adequacy analysis • Critical asset resilience tests • Site risk assessment reports • Production performance deviation analyses • Risk assessment studies	• Documentary review procedures • Post-incident root cause analysis investigations • Insurance policy coverage tests
	Waste and Circular Economy Risks	• Waste inventory tracking • Licensed disposal contractor contract checks • Legal notification schedule checks • Solar panel end-of-life disposal plan	• Review of waste transfer forms • Financial control of environmental liability provisions
Social Risks (S)	**Employee Relations and Human Rights Risks**	• Human Resources Policy • Ethical Rules, Ethics Hotline • Mobbing Training • Payroll automation controls • Performance system ethical control items • Payroll – bank payment reconciliation • Overtime hours – system comparison • Promotion/salary increase analysis (equality test) • Employee satisfaction survey risk analysis • Supplier evaluation surveys • Inclusion of ESG clauses in supplier contracts • Child labour compliance controls	• Payroll sample test • Overtime record verification test • Supplier contract ESG clause check • Ethics hotline assessments
Governance Risks (G)	**Accuracy of ESG data** **Reliability of reporting** **Risk of rights violations due to performance pressure**	• ESG data verification • Data ownership matrix • Board of Directors periodic ESG reporting • Integration of ESG KPIs into the performance system • Internal control self-assessment process	• ESG data recalculation, validation tests • Board of Directors ESG agenda control • KPI target – actual performance analysis • Authority matrix compliance test

3. Within the Scope of Internal Audit

ESG risks are included in the risk-based process-oriented internal audit programme and will be conducted within the scope of the risk control matrix in accordance with the calendar schedule.

ESG Areas Included in the Audit Programme:

1. Human Resources and Payroll Audit
2. Supplier ESG Compliance
3. Occupational Health and Safety Field Audit
4. Environmental Legislation Compliance Audit
5. ESG Data Reliability
6. Carbon Reporting Verification

Internal Audit Assurance Level

Internal Audit aims to provide reasonable assurance regarding:

- Control design adequacy,
- Operational effectiveness,
- Data accuracy, recalculation
- Compliance with regulations

Audit findings:
- Reported with risk rating,
- Action plan created,
- Closure/mitigation plans verified with follow-up audits.