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ENVIRONMENTAL POLICY



1.0 PURPOSE

The purpose of this policy is to establish the commitments and targets of Naturel Holding and its Subsidiaries regarding environmental management within the scope of renewable energy, prioritizing environmental protection, preventing problems at their source, securing human health and raising living standards to the highest level.

2.0 SCOPE

This policy covers all employees and activities of Naturel Holding and its Subsidiaries.

3.0 PRINCIPLES and PRACTICES

Our Environmental Policy consists of the following items:

Environmental Management System

The objectives of this policy are to promote continuous improvement of the environmental and social performance through the effective use of ISO 14001:2015 environmental management system.

Emissions

This policy outlines a responsibility approach to climate impacts and greenhouse gas emissions, resource management and pollution prevention and control.

As part of our Environmental Policy and in line with also ISO 50001 system, we are taking measures to continuously improve the greenhouse gas emissions caused by our core activities, primarily from our electricity consumption. We are also investing in battery storage to increase the use of renewable energy in our operations.

Dialogue

Our cooperation and dialogue with our customers, employees, suppliers and all other third parties to achieve our environmental goals is based on partnership and trust.

Naturel Holding recognizes the importance of conducting integrated assessments to identify environmental risks and impacts associated with its objectives and customer management of environmental and social performance. A successful and effective environmental management system supports healthy and sustainable environmental and social performance and can improve financial, environmental and social outcomes. This is a dynamic and ongoing process initiated and supported by the management board and includes meaningful communication between all partners.

Risk Management

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Naturel Holding recognises the importance of addressing both the causes and the consequences of climate change in its countries of operation. Naturel Holding will engage, whenever appropriate, in innovative investments and technical assistance to support non/low-carbon investments and climate change mitigation and adaptation opportunities, as well as identify opportunities to avoid, minimize or reduce greenhouse gas emissions in projects. Naturel Holding will also support developing climate adaptation measures and climate-resilient investments and managing risks caused by climate change.

Education

It has been accepted by both international and national public opinion that corporate perception and approaches play a significant role in achieving environmental goals. In this regard, environmental education and environmental awareness have been adopted by Naturel Holding as essential tools of contemporary environmental policy.

Monitoring of Environmental Performance

Naturel Holding aims to carry out measurements and controls in accordance with environmental laws and regulations to monitor environmental performance indicators. It also audits and monitors processes and activities that have significant environmental impacts.

Chemicals: Using Safely and Effectively

Naturel Holding determines the conditions to protect employees' health from effects of chemical and biological substances used or processed in the workplace and provides a safe working environment. Chemical and biological hazards in the risk analysis involving our activities are evaluated in accordance with 98/24/EC directives, and suitable personal protective equipment is determined for all activities.

Evaluation of Noise Emission

Naturel Holding shows sensitivity to its employees, customer private areas and civilians in managing air emissions, environmental noise and vibrations occurring from its activities. Noise emissions from Naturel Holding facilities do not exceed the limits declared in Regulation No. 27601. Additionally, maximum noise values are considered in densely populated areas, quiet places in open areas, schools, hospitals and military areas.

Water Management

Clean water resources are the most sensitive values today. Limited water, careless management and impact of climate change on water resources will result in limited availability and quality, leading to inequitable distribution, especially in water-scarce areas. Naturel Holding is aware of the importance of water and the impacts if water is not available. Therefore, Naturel Holding has integrated water management into its ISO 14001:2015 Environmental Management System to ensure that water utilization of all operations is managed

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in accordance with the compliance regulations of all places where it operates. Naturel Holding supports the UN Sustainable Development Goal 6 on clean water (SDG6) and has set targets to reduce water consumption across all business units. Additionally, we also closely monitor our corporate water footprint.

Waste Management

Due to the diverse nature of activities undertaken by Naturel Holding, a wide variety of wastes are produced and collected, ranging from general wastes and recyclable materials to hazardous and non-hazardous wastes. Naturel Holding has a duty to ensure that all of these wastes are disposed of responsibly using approved registered waste contractors.

E-Waste Management

As per our e-waste policy we are taking initiatives to recycle, repurpose, e-waste produced by our offices. To manage an environmentally friendly treatment of waste, we have set up a Waste Management Sub-Committee in our company, which works with city and municipal authorities to properly handle and recycle e-waste such as laptops, monitors, fax machines and printers.

SOx, NOx and VOC Emissions

Our company is committed to reducing the use of sulfur-containing fuels to achieve lower NOx emissions. In this context, we are replacing our fossil fuel-powered vehicles with electric vehicles to eliminate our NOx emissions. Regarding our processes and services, we do not have any SOx emissions in our operations. Additionally, we prioritize the use of environmentally friendly chemicals that are free of VOC content.

Energy and Resource Efficiency Management

The energy and resource efficiency approach of Naturel Holding is directly related to the sustainability of growth and social development goals. Due to the key role this approach plays in reducing total greenhouse gas emissions, it is one of the areas that are handled with sensitivity.

Naturel Holding carries out its activities considering both legal Laws and Regulations and 2023/1791 (EU) Directive.

Carbon Footprint Management

In line with the Paris Climate Agreement 2050 net zero targets, we measure our carbon footprint in accordance with ISO 14064 standard and develop projects aimed at reducing it. We aim to sell the benefits resulting from renewable energy production to companies planning to neutralize their carbon footprint in the market by issuing carbon certificates.

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As Naturel Holding and its Subsidiaries, we are renewable energy producers targeting to issue carbon certifications and trade them in the market to help other companies offset their carbon footprints.

Green Office

Our company is committed to promoting environmental sustainability and reducing our ecological footprint in the office. To achieve this, we minimize energy consumption by using energy-efficient lightning and electronic devices. Additionally, we encourage water conservation and reduce paper waste by using digital documents whenever possible. Our policy aims to foster eco-friendly habits among our employees and will be continuously improved in line with our goals.

Sustainable Transportation

As per our Environmental Policy, we are actively implementing initiatives to mitigate the environmental impact of staff transportation. We encourage alternative options such as carpooling at our Ankara Office, promoting online meetings and the use of public transportation. Accordingly, we have taken further actions to increase the number of electric vehicles in our fleet, thereby reducing carbon emissions. As part of our Sustainability Webinars, we present more sustainable choices in every context of our lives and transportation is one of them. Through our measures, we aim to significantly reduce the carbon footprint associated with employees commuting.

Biodiversity

Within the scope of our Environmental Policy, we are committed to increasing biodiversity, which is critical for the sustainability of the world while developing projects. We are working to develop agro-solar power plant projects in applicable regions in order to protect and increase biodiversity.

Community Dialogue, Public Consultation and Regulatory Compliance

Naturel Enerji commits to full compliance with applicable Turkish legislation governing environmental permitting, public participation and community consultation processes in relation to new infrastructure investments and restructuring activities involving additional land use.

In particular, projects are developed in alignment with:

- Turkish Environmental Law No. 2872
- Constitution of the Republic of Turkey Law No. 2709 Art. 56
- Climate Law No. 7552
- Soil Use and Land Law No. 5403

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- Environmental Impact Assessment Regulation (ÇED Yönetmeliği), including mandatory Public Participation Meetings (Halkın Katılımı Toplantıları) where applicable
- Other relevant sectoral and permitting regulations applicable to renewable energy projects

For projects financed under this Framework, Environmental and Social Impact Assessment (ESIA/ÇSED) processes are conducted where required, ensuring systematic identification, assessment and mitigation of environmental and social risks.

In addition to national regulatory requirements, Naturel Enerji aligns its practices, where relevant, with internationally recognized frameworks, including:

- ICMA Green Bond Principles (GBP) – particularly with respect to transparency, reporting and management of environmental and social risks
- IFC Performance Standards on Environmental and Social Sustainability, especially Performance Standard 1 (Assessment and Management of Environmental and Social Risks and Impacts) and Performance Standard 4 (Community Health, Safety and Security)

Stakeholder Engagement Commitments

Naturel Enerji maintains a structured and continuous stakeholder engagement approach throughout the project lifecycle (development, construction and operation phases). This includes:

- Timely and transparent disclosure of project-related environmental and social information
- Organization of public consultation meetings in accordance with regulatory requirements
- Establishment of accessible grievance mechanisms and dispute resolution processes
- Implementation of community dialogue platforms, such as Community Advisory Panels (where appropriate)
- Sharing of environmental monitoring outcomes where relevant
- Communication and, where appropriate, joint development of emergency preparedness and response plans with local authorities and affected communities

Naturel Enerji recognizes that maintaining a social license to operate is essential for long-term value creation. Accordingly, community engagement and dialogue are embedded within the Company's Environmental and Social Risk Management framework and sustainability governance structure.

Reviewing of Policy

We review our Environmental policy with Corporate Governance Committee once a year to evaluate its effectiveness and make necessary improvements.

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4.0 REVISION HISTORY

Revision No	Rev. Date	Revised Titles	Explanations
01	09.2023	3.0	General application principles revised.
02	05.2024	3.0	General application principles revised.
03	07.2024	3.0	General application principles revised.
04	26.02.2026	3.0	Community Dialogue, Public Consultation and Regulatory Compliance and Stakeholder Engagement Commitments titles are added.

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