## 1.0 PURPOSE

This procedure is carried out by Naturel Holding A.Ş. and its Affiliates, in line with the existing Management Systems and the newly created Management Systems, it aims to determine the elements that may affect the environment as a result of all activities, to carry out risk assessment in line with these elements, to create a relevant environmental management program and to implement it by taking into account legal requirements.

## 2.0 SCOPE

This procedure covers monitoring and reducing natural resource consumption, disposal of waste, preparation for environmental emergencies, evaluation and responsibilities of products, services and activities with a life cycle approach.

## 3.0 DEFINITIONS, TERMS

**Environment:** It is the physical, biological, social, economic and cultural environment in which humans and other living things maintain their relationships and interact throughout their lives.
**Environmental Impact:** Positive or negative changes made to the environment, partially or completely, resulting from our company's environmental aspects.
**Environmental Dimension:** A part of our company's activities and services that interact with the environment.
**Environmental Goal:** A success condition that can be applied to our company, arising from environmental goals, and whose determination and fulfillment can be evaluated and measured together with the QMS in order to achieve these goals.
**Assessment of Environmental Impacts:** Determining the probability of environmental impact and the significance of its outcome.
**Environmental Management Program (EMP):** The tools used to achieve environmental goals and objectives are determined and explained within the framework of a program.
**Emergency:** Events such as uncontrolled emissions, discharge, leakage, fire, explosion, spill, accident, natural disaster.
**Air Quality:** A set of clean, breathable parameters that are indicators of air pollution affecting humans and the environment, decreasing with increasing amounts of air pollutants present in the ambient air.
**Air Pollutants:** Chemical substances in the form of soot, smoke, oxides, dust, gas, vapor and aerosol that change the natural composition of the air.
**Noise:** It is a sound spectrum with an arbitrary structure and is subjectively defined as "unwanted sound".
**Recycling/Reuse:** The use of wastes in the same form over and over again until their economic life expires, without being subjected to any process other than collection and cleaning.
**Recycling:** Including the concepts of recycling and introducing waste into the production process as a second raw material after physical and/or chemical processes; Converting the components of waste into other products or energy by physical, chemical or biochemical methods by taking advantage of their properties.
**Packaging Waste:** Including expired reusable packaging used for the presentation of the product and formed after the use of the product, during the delivery of the products to the consumer or end user, excluding packaging or packaging material production or production residues arising during any production.

**Waste Water:** Water that is polluted or whose properties have been partially or completely changed as a result of domestic, industrial, agricultural and other uses, waters originating from mines and ore preparation facilities, and rain from built-up paved and unpaved city areas, streets, parking lots and similar areas as a result of the transformation into surface or underground flow.

**Disposal/Final Storage:** After processes such as temporary accumulation of solid waste in places where they are produced, such as residences and workplaces, collecting, transporting and recycling, composting and burning to gain energy in order to render them harmless for the environment and human health and to contribute to the economy and/or all regular final storage operations.

**Process Inputs:** Natural resources, raw materials, chemical and energy inputs and related activities (use, transportation, storage).

**Process Outputs:** All kinds of wastes and controlled or uncontrolled discharges from the process (solid wastes, hazardous wastes, liquid wastes, emissions, dust, noise, vibration, odor, other) and related activities.

**Emissions:** Combustion of fuel and similar; They are air pollutants emitted into the atmosphere from a facility as a result of synthesis, decomposition, evaporation and similar processes, accumulation, separation, transportation of substances and other such mechanical processes.

**Hazardous Waste:** Explosive, flammable, susceptible to spontaneous combustion, releasing flammable gases in contact with water, oxidizing, containing organic peroxides, toxic corrosive, releasing toxic gases in contact with air and water, having toxic and ecotoxic properties, and legally approved as hazardous and harmful waste.

**Non-Hazardous Waste:** It covers wastes generated as a result of activities and approved by the ministry as not harming human and environmental health.

**Life Cycle:** A product or service; These are successive and interconnected stages from raw material procurement or production from natural resources to final disposal. Life cycle stages include raw material acquisition, transportation, distribution, use, end-of-life treatment and final disposal.

**Thermal Energy:** It is a form of energy that expresses the sum of the potential and kinetic energies of an object or substance in the environment or system as a result of the ambient or system temperature.

**Temporary Waste Storage Area (Hazardous/Non-Hazardous Waste Area):** A place where waste is stored safely until the amount of waste reaches sufficient capacity before being delivered to pre-treatment, recovery or disposal facilities.

**Reuse:** Refers to any process in which products or non-waste components are used for the same purpose as designed.

**Separation at Source:** It refers to the accumulation and collection of wastes separately from other wastes in the places where they are generated.

**Waste Transportation Request:** The process of opening a request through the Waste Management Application/MOTAT software in order to carry out transportation operations from the location of the waste to the waste processing facility.

**Domestic Waste:** Home, workplace, etc. It refers to waste from public places that does not create waste with industrial content and does not fall into the concept of hazardous and harmful waste.

**Industrial Waste:** It refers to the recyclable or non-recyclable waste that remains from the substances that have been processed or consumed in the industrial sector and that cannot be processed in any way over time.

Integrated Environmental Information System: T.R. It is an application that covers various services within the scope of the Ministry of Environment, Urbanization and Climate Change. ECBS; Waste Management Application

(TABS/MOTAT), BEKRA Notification, Packaging Information System, etc. It is a system that allows integrated use of systems.

## 4.0 RESPONSIBILITY

Management Board, Department Managers, Quality Management Department and Environmental Management Board, Environment Sub-Committee and Waste Evaluation Sub-Committee are responsible for the implementation of this instruction.

## 5.0 APPLICATION

### 5.1 Life Cycle Approach

Naturel Holding A.Ş. and its affiliates have evaluated all their activities from EPC activities to electricity production and transmission in line with the life cycle approach, and defined their areas of control and influence and the inputs and outputs affecting these areas in the Life Cycle Form. Naturel Holding A.Ş. and its affiliates' life cycle stages, EPC project design, electricity generation, operational processes, energy sales activities, including the final disposal of hazardous and non-hazardous waste and the recovery of recyclable waste.

Naturel Holding A.Ş. and its affiliates determine the environmental aspects of all their activities, from EPC project design to electricity production and sales activities to the final disposal of the outputs, with a life cycle approach and evaluate the environmental aspects and impacts in the Environmental Aspects and Impacts Evaluation Form.

Naturel Holding A.Ş. and its affiliates, in line with the life cycle perspective, EPC and the development of processes for electricity generation and energy sales service, waste management, emergency management and environmental aspects for the outsourcing, transportation, use, end-of-life treatment and disposal of products and services defined the criteria for assessing impacts and identified appropriate controls.

### 5.2 Identifying Environmental Risks and Opportunities

Risks and Opportunities related to the Environmental Management system are determined in accordance with the Risk and Opportunity Management Procedure and evaluated in the Risk and Opportunity Assessment Form. Risks associated with environmental aspects are evaluated in more detail in the Environmental Aspects and Impacts Evaluation Form.

### 5.3 Creation of Environmental Management Program (EMP) and Evaluation of Compliance

With the Life Cycle approach, the Environmental Board determines the environmental aspects of activities and services and evaluates their impacts in accordance with the Environmental Management Procedure. Determining and monitoring environmental objectives and determining responsibilities are carried out according to the Quality Objectives Determination, Planning and Monitoring Procedure. Environmental System Compliance Obligations are determined in line with the Legal Requirements and External Documents Tracking Procedure, and the necessary actions are initiated by monitoring the OHS and Environment Annual Monitoring and Measurement Plan. In case of any nonconformity encountered in environmental practices, action is initiated according to the Corrective Action Procedure.

**5.4 Environmental Operations**

**5.4.1 Air Quality Protection Methods**

Industrial Air Quality Protection Methods are carried out in accordance with the Environmental Legislation - Air Quality Assessment and Management Regulation. The Environmental Management Board is responsible for the development and updating of Air Quality Protection Methods.

**5.4.2 Noise Control Methods**

Noise Control Methods are prepared and implemented in accordance with the Environmental Legislation - Environmental Noise Assessment and Management Regulation. The Environmental Board is responsible for the development and updating of Noise Control Methods. Whether the resulting noise level is below the legal legislation is checked by the institution authorized by the Ministry, depending on changes in environmental conditions.

**5.4.3 Water Pollution Control Methods**

Water Pollution Control Methods are prepared and implemented in accordance with Environmental Legislation - Water Pollution Control Regulation. The Environmental Board is responsible for the development and updating of Water Pollution Control Methods. The majority of wastewater generated is domestic wastewater. These are discharged into the sewer system and do not cause any harm to the environment.

**5.4.4 Energy Management**

Senior Management is responsible for Energy Management. Electricity, fuel oil and natural gas are used as energy. The necessary records for all kinds of energy consumed come to the Financial Affairs Unit as invoices, and the consumption amounts are recorded by the Quality Unit with the Natural Resource Use Monitoring Form. The precautions taken for accidents and emergencies that may be caused by the types of energy used and what to do **in case of emergencies are stated in the Emergency Plan.**

**5.4.5 Soil Pollution Control Methods**

Control of soil pollution is prepared and implemented in accordance with Environmental Legislation - Regulation on Control of Soil Pollution and Point Source Contaminated Sites. The Environmental Board is responsible for the development and updating of soil pollution control methods. Contamination from waste areas to the soil is prevented, and the waste is properly separated at the source and given to the recycling company for disposal.

**5.4.6 Waste Management**

Control of waste is carried out in accordance with Environmental Legislation - Waste Management Regulation. The Environmental Board is responsible for controlling waste and updating its methods. Waste Management is implemented according to the Waste Management Instruction.

**5.5 Environmental Emergency Application**

In case of environmental accidents such as chemical spills, wastewater overflows and fires, the accident is examined and recorded by the Quality Unit with the OHS and Environmental Accident Incident Report. Taking into account the cause of the accident, root cause analysis is performed and necessary corrective actions are planned. The Quality Unit is responsible for monitoring corrective actions. In case of a large-scale environmental accident, the Provincial Directorate of Environment and Urbanization is notified with the approval of the Senior Management/Company Manager and the Central IMS and Business Processes Unit.

In order to prevent pollution resulting from accidental or intentional waste dumping and similar events, actions are planned to restore the scene within 1 month from the moment the incident occurs, depending on the type of waste. The Quality Unit is responsible for planning and monitoring the actions.
For all emergencies, action is taken in accordance with the Emergency Plan.

As stated in the Regulation on Emergency Situations in Workplaces, Fire, Earthquake, Environment, Protection and Rescue emergency drills are held at least once a year to ensure the applicability of the Emergency Plan. Planning and organization of drills are the responsibility of the Environmental Board. Training is provided regarding the drill and the situation experienced. An Exercise Report is prepared regarding the exercise carried out. If a necessary situation exists after this report, corrective action is initiated.

**5.6 Environmental Impact Assessment (EIA)**

It evaluates the necessity of preparing an EIA report in order to evaluate the effects of the infrastructure works on the environment and formalizes it by corresponding with the relevant institutions.

**6.0 REVISION HISTORY**

| Revision No | Rev. Date | Revised Titles | Explanations |
|---|---|---|---|
| 01 | 04.09.2023 | - | General informations revised. |