

## 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.

Naturel Holding and its Subsidiaries work with their *Environment Sub-Committees* to ensure this policy and its commitments are implemented across the organisation.

## 2.0 SCOPE

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

## 3.0 PRINCIPLES and PRACTICES

### ***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***

As part of Environmental Policy and in line with also ISO 50001 system and ISO 14064, Naturel Holding and its Subsidiaries take measures to continuously improve the greenhouse gas emissions caused by their core operations and activities, primarily from their electricity consumption. They also invest in battery storage systems and other innovative products to increase the use of renewable energy in their operations.

### ***Dialogue with Value Chain***

Naturel Holding and its Subsidiaries maintain an open, transparent and regular communication with their stakeholders in their value chain in order to raise their awareness in sustainability goals, environmental goals and support a collaborative approach in achieving the global targets set by Paris Agreement, COP agreements, etc.

### ***Risk Management***

Naturel Holding and its subsidiaries recognise the importance of addressing both the causes and the consequences of climate change in its countries of operation. They 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. They 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 and its subsidiaries aim 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.

### ***Toxic Chemicals Reduction***

Naturel Holding and its subsidiaries determine 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 their 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 and its subsidiaries show 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***

Naturel Holding and its subsidiaries integrated water management into its ISO 14001:2015 Environmental Management System to ensure that water utilization of all operations is managed 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. In addition to all these, their corporate water footprint is also closely monitored.

### ***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 their e-waste policy Naturel Holding and its Subsidiaries take initiatives to recycle, re-purpose, e-waste produced by their offices. In order to manage an environmental friendly treatment of waste they have set up a Waste Management Sub-Committees which work in collaboration with city and municipal authorities to properly handle and recycle e-waste such as lap tops, screens, fax machines and printers.

### ***SOx, NOx and VOC Emissions***

Naturel Holding and its subsidiaries act with the aim of reducing the use of fuels containing sulfur in line with the goal of reducing NOx emissions. In this context, any fossil fuel-powered vehicles are being replaced with electric vehicles in order to reduce their NOx emissions. They do not emit SOx emissions in their operations. In addition, with their Supplier Policy, they commit to selecting suppliers that work with no or low VOC content as environmentally friendly products, take actions to reduce and completely phase out from these emissions and reporting their emissions in line with ISO 14001:2015 Environmental Management System.

### ***Energy Efficiency Management***

As per its Energy Efficiency Policy, the energy efficiency approach of Naturel Holding and its subsidiaries promote the use and increase of renewable energy consumption and using innovative climate technology products to increase production efficiency in renewable energy generation operations.

### ***Carbon Footprint Management***

In line with the Paris Agreement 2050 net zero emission targets, Naturel Holding and its subsidiaries measure their carbon footprint annually with a report prepared by a third party consultant in accordance with ISO 14064 standards. They set targets to reduce the measured carbon emissions in line with global best practices and standards.

### ***Green Office***

Naturel Holding and its subsidiaries is committed to promoting environmental sustainability and reducing their ecological footprint in offices. To achieve this, energy consumption is minimized by using energy-efficient lighting and electronic devices. In addition, water conservation is encouraged and paper waste is reduced by using digital documents whenever possible. They recycle metal, plastic and paper by separating bins at consumption points. They also take important measures to choose green offices with green Office and sustainability certifications.

### **Sustainable Transportation**

Naturel Holding and its subsidiaries actively take initiatives to reduce the environmental impact of staff transportation. They encourage alternative options such as carpooling at Ankara Office, promoting online meetings and the use of public transportation. In this context, they take actions to reduce carbon emissions by increasing the number of electric vehicles in their fleet. They provide Sustainability Webinars provide information on more sustainable practices in every context of our lives. Sustainable transportation is one of these. With measurable targets, they aim to significantly reduce the carbon footprint of employees' commuting.

### **Biodiversity**

Naturel Holding and its subsidiaries commit to first protect and to improve biodiversity in their core operations and with their sustainability and CSR projects. Environment assessment reports that are prepared for project development of renewable energy projects also include information on biodiversity assessment. Their policy to invest in agrosolar power plant projects aim to protect the biodiversity of nature.

### **Review of the Policy**

The Environmental Policy is reviewed once a year by the Corporate Governance Committee, its effectiveness is evaluated and necessary improvements are made.

## **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.