

	<h1>Energy Policy</h1>	Effective Date:	31.12.2024
		Revision Date:	-
		Revision No:	0

## 1. PURPOSE and SCOPE

In all its operations, ATAŞ aims to ensure efficient use of resources through management of energy consumption with a systematic approach and to reduce energy costs accordingly. In this context, it aims to establish, implement and ensure the sustainability of an energy management system targeting continuous improvement of energy performance and efficiency. This energy policy ("Policy") includes ATAŞ's undertakings related to Energy management.

This policy covers all ATAŞ employees, directors and stakeholders.

This Policy constitutes an integrity with ATAŞ Ethical Principles, values and work culture.

## 2. DEFINITIONS

- **ATAŞ or Company:** Avrasya Tüneli İşletme İnşaat ve Yatırım A.Ş.
- **ATAŞ Ethics Line:** Independent reporting line for reporting violations, irregularities or suspicions regarding ATAŞ Ethical Principles (E-mail: [avrasyatuneli@peak-hub.com](mailto:avrasyatuneli@peak-hub.com), Telephone: 02128006588)
- **ATAŞ Ethical Principles:** Ethical principles with which ATAŞ, its employees and stakeholders are required to comply, specified by the document entitled Ethical Principles / Code of Conduct issued by ATAŞ
- **Top Management:** CEO (General Manager), CFO (Deputy General Manager), CTO (Deputy General Manager) or management personnel to be designated by ATAŞ's board of directors from time to time

## 3. PRINCIPLES AND UNDERTAKINGS

ATAŞ:

- ◇ aims to reduce consumption of energy and natural resources in all its activities.
- ◇ complies with the legal legislation related to energy consumption and efficient use of energy.
- ◇ ensures that all employees participate in this system with the responsibility and awareness of using energy resources efficiently by reducing waste of natural resources for the purpose of maintaining energy efficiency, and organizes activities to increase awareness through information flow and training for this purpose.
- ◇ prefers environmentally- and energy-friendly technologies during purchase of equipment for its new projects.
- ◇ aims to save on energy and reduce consumption of natural resources by making efficiency enhancing improvements in its existing systems.
- ◇ provides sufficient resources (know-how, expertise and economic resources) to achieve targets related to energy and continuously reviews them.
- ◇ complies with statutory liabilities required in terms of energy consumption and efficient use of energy and satisfies expectations of respective parties, acts in accordance with statutory and administrative regulations and cooperates with corporations aiming to do the same.

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- ◇ periodically reports its energy performance which is constantly monitored and shares it with its internal and external stakeholders.

#### 4. AUTHORITY AND RESPONSIBILITY

All ATAŞ employees, including Top Management, must comply with this Policy.

All ATAŞ employees are responsible for ensuring that the Company's procedures and practices comply with this Policy and avoiding any activities and practices that are contrary to the principles and commitments of this Policy.

ATAŞ expects and demands that all its stakeholders, including its suppliers, act in compliance with the principles and commitments set forth in this Policy.

ATAŞ undertakes that this Policy is binding for all business processes in which it operates and that it will act in accordance with this Policy.

#### 5. AGAINST VIOLATIONS

You should report any acts or actions you think are violating this Policy to **ATAŞ Ethics Line**. All applications to ATAŞ Ethics Line, including suspected violations, will be reviewed confidentially and with great care in accordance with ATAŞ's policies, procedures and operational rules.

ATAŞ protects the people who report to this line, and within this scope, works with independent third parties to operate this line. Those reporting to this line shall not be disclosed. Except for intentionally false statements, ATAŞ does not retaliate against any employee or stakeholder or take any counter-action for any notifications made within this scope.

Violation of this Policy by an employee may result in disciplinary action up to and including termination of employment. In the event that any stakeholder expected to act in accordance with this Policy acts in violation of this Policy, this may result in termination of the business relationship with ATAŞ or termination of relevant contracts.

#### 6. EFFECTIVE DATE and APPLICATION

This Policy was adopted by Top Management on the effective date stated above and entered into force as of this date. ATAŞ may revise or amend this Policy after its effective date if any need is identified.

ATAŞ employees may consult Human and Culture Department for any questions related to application of this Policy.

ATAŞ regularly reviews and reports its commitments, efforts and declarations within the scope of this Policy as part of its periodic sustainability report.

This Policy is available to all employees, stakeholders and the public in Turkish and English on the ATAŞ website and the internal documentation system.