

	Environment and Climate Change Policy	Effective Date:	31.12.2024
		Revision Date:	-
		Revision No:	0

1. PURPOSE and SCOPE

Protecting the environment in all our activities, as ATAŞ, is one of our most fundamental values. This environment and climate change policy ("Policy") includes ATAŞ's undertakings related to the environment and climate change.

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@speak-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:

- ◇ follows all respective legal requirements and practices while conducting its operations and fully complies with local, regional, national and international environment regulations.
- ◇ takes corrective and improving actions in the event of identification of any nonconformities.
- ◇ organizes events and trainings in order to increase awareness about the environment.
- ◇ aims to reach the target of zero environment accident with all its employees, sub-employers, suppliers.
- ◇ aims to effectively use natural resources and minimize waste.
- ◇ encourages efficient use of energy, water and other natural resources to protect them.
- ◇ continuously monitors and evaluates its environmental performance. Identifies opportunities for improvement and uses environmental performance indicators to achieve short-, medium- and long-term targets.
- ◇ regularly monitors and reports on protection and improvement of air quality and satisfies air quality standards.
- ◇ increases awareness on protection and improvement of air quality by informing and training the employees and subcontractors.

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- ◇ rapidly and fairly evaluates any complaints related to air pollution.
- ◇ cares about fight with climate change and aims to minimize emissions arising from its activities. In this scope;
 - It takes energy efficiency measures, prefers renewable energy sources, innovative technologies/applications and makes use of sustainable transportation solutions such as cycling, public transportation or electric vehicles in order to reduce energy consumption and greenhouse gas emissions in the fight against climate change. It performs continuous improvement and monitoring studies to reduce carbon and water footprints.
 - Calculates greenhouse gas emissions every year, sets a target for reducing them and monitors its performance.
 - Takes actions necessary to become a carbon neutral project every year.
 - Aims to abate greenhouse gas emissions by increasing use of renewable energy resources.
 - Makes use of all risks and opportunities that may arise as a result of climate change.
- ◇ pursuant to the target of “zero waste”, it makes planning for preventing formation of waste, then separating waste at source, reducing, recycling waste and disposing the same in accordance with statutory regulations.

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

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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.