

	<b>Occupational Health and Safety Policy</b>	Effective Date:	31.12.2024
		Revision Date:	-
		Revision No:	0

## 1. PURPOSE and SCOPE

Taking all measures related to occupational health and safety and providing a healthy and safe working environment to our employees are some of ATAŞ's most fundamental values.

This occupational health and safety policy ("Policy") includes ATAŞ's undertakings related to occupational health and safety.

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](mailto: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:

- ◇ gives priority to human life. Accordingly respects all legal regulations related to occupational health and safety, provides suitable environments to its employees.
- ◇ follows all respective legal requirements and practices while conducting its operations and fully complies with local, regional, national and international occupational health and safety regulations. Takes corrective and improving actions in the event of identification of any non-conformities.
- ◇ aims to reach the targets of zero work accident, zero occupational disease with all stakeholders.
- ◇ organizes events and trainings in order to increase awareness about occupational health and safety.
- ◇ does its best and takes necessary actions to ensure that all its employees and directors work in such a way as not to risk occupational health and safety, take all precautions, observe the rules and procedures specified on this subject.
- ◇ makes any necessary plans against potential emergencies such as fire, earthquake, flood, injury and epidemics, takes proactive measures, checks the applicability of the measures and makes any necessary updates.

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- ◇ ensures that all accidents and incidents, including near-miss incidents, are investigated and reported in order to prevent recurrence of similar incidents, injuries and occupational diseases.
- ◇ takes all kinds of measures for health and safety of its employees, subcontractors, suppliers, visitors, locals and personnel assigned to somewhere outside the workplace, provides all necessary tools and equipment, materials, personal protective equipment and other sources and ensures usage of the same where necessary.
- ◇ determines any hazards related to the activities, evaluates the risks, describes any control measures necessary to reduce the risks and ensures that the work is carried out in accordance with the designated measures.
- ◇ for the purpose of ensuring development of an occupational safety culture in all its processes, it receives the opinions and suggestions of its employees on the subject, and monitors the activities every year to ensure engagement of its employees and internalization of occupational safety.

#### 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.

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#### 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.