

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

## 1. PURPOSE and SCOPE

Managing its processes with studies supporting Sustainable Development Goals of the United Nations in line with a business plan based on environmental, social and economic factors within the scope of a sustainable business approach are some of the most fundamental values of ATAŞ.

This sustainability policy ("Policy") includes ATAŞ's undertakings related to sustainability.

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
- **Sustainable Development Goals of the United Nations:** A collection of 17 objectives aiming to address global challenges, including poverty, inequality, environmental problems and injustice.
- **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:

- ◇ builds its sustainability strategy in accordance with Sustainable Development Goals of the United Nations.
- ◇ conducts its activities in accordance with ATAŞ Ethical Principles, ethical rules, standards, legal and their terms.
- ◇ sets forth a competitive sustainable governance approach by emphasizing environmental, social and economic factors.
- ◇ manages its environmental processes such as fight with climate change, abatement of environmental impacts and protection of natural resources with its stakeholders.
- ◇ measures environmental, social and economic impacts in all its activities, sets targets to reduce negative factors.
- ◇ manages environmental and social impacts by acting together with its stakeholders and prioritizes social benefits.
- ◇ shares its operations conducted under sustainability and its experiences with all stakeholders in an open and transparent manner.

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- ◇ adopts sustainable supply chain practices and supports development of all business partners and stakeholders, primarily suppliers.
- ◇ implements projects for increasing all employees' awareness and qualifications about sustainability.

#### 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.