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ENVIRONMENTAL POLICY

ARTICLE 1. PURPOSE AND SCOPE

The purpose of this Environmental Policy (the “Policy”) is to establish and define the general principles and scope of implementation to be followed by Akfen Holding Anonim Sirketi (“Akfen Holding” or the “Company”) and its subsidiaries (Akfen Holding and its subsidiaries collectively referred to as the “Companies”) in their environmental management processes, and to ensure that the necessary actions are taken for the implementation of environmental management-related legislation, national and international standards and systems and for compliance with the Companies’ sustainability strategies.

ARTICLE 2. DEFINITIONS

The specific terms and concepts used in this Policy are briefly defined below:

Employee refers to the managers and employees of the Companies.

Greenhouse Gas Emissions refer to the release into the atmosphere of gases such as carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O), which cause solar radiation reflected from the Earth’s surface to be retained in the atmosphere and contribute to global warming.

Circular Economy refers to a model that aims to minimize waste generation while maintaining the value of materials and resources for as long as possible by returning them to the product cycle at the end of their use.

Supply Chain refers to the entire system encompassing companies, people, technologies, activities and resources involved in the movement of a product or service from the supplier to the customer.

ARTICLE 3. PRINCIPLES AND GUIDELINES

3.1. The Company, with respect to environmental management and environmental sustainability:

- 3.1.1. plans its activities by assessing environmental impacts and takes the necessary measures in all its activities;
- 3.1.2. ensures the adoption of environmentally responsible practices throughout its value chain, including suppliers;
- 3.1.3. develops and implements environmental management systems aimed at mitigating environmental risks, ensuring the effective management of natural resources, and improving resource and energy efficiency;
- 3.1.4. establishes and regularly updates its strategic environmental priorities and objectives;

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- 3.1.5. conducts regular training activities aimed at raising environmental awareness among employees, suppliers and relevant stakeholders;
- 3.1.6. establishes measurable and verifiable environmental objectives;
- 3.1.7. complies with the environmental legislation in force in the countries where it operates and with national and international environmental standards, and aims to support relevant voluntary initiatives and good practices;
- 3.1.8. adopts a responsible approach to production and consumption processes; and
- 3.1.9. undertakes efforts to meet its energy needs from sustainable and efficient sources and supports the use of new technologies, innovative and eco-efficient practices.

3.2. The Company, with respect to environmental risks:

- 3.2.1. identifies environmental risks in project development and operational processes and regularly monitors, measures, assesses and reports such risks;
- 3.2.2. implements improvement measures aimed at mitigating environmental risks and preventing, minimizing or, where appropriate, remedying adverse environmental impacts;
- 3.2.3. develops practices aimed at protecting water, air, soil and biodiversity and supports the sustainable use of natural resources;
- 3.2.4. takes the necessary measures with regard to emissions reduction, waste and chemical management, and resource efficiency;
- 3.2.5. continuously improves its environmental policies. The Company also practices and implements the necessary practices and measures aimed at ensuring the effective and efficient use of energy, reducing emissions, managing waste and chemicals, and improving resource efficiency; and
- 3.2.6. regularly reviews its environmental policies and practices and improves them in line with a continuous improvement approach.

3.3. The Company, with respect to waste and recycling management:

- 3.3.1. ensures that the necessary arrangements are made to prevent waste generation and that an effective waste management system is established;
- 3.3.2. conducts activities aimed at raising awareness among employees and suppliers regarding waste management and its environmental impacts;
- 3.3.3. develops and implements systems for the reuse of waste;

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- 3.3.4. informs employees and suppliers about materials that are suitable and unsuitable for recycling;
- 3.3.5. supports the reintegration of waste into the economy through recycling or recovery;
- 3.3.6. ensures compliance with the applicable legislation relating to waste management;
- 3.3.7. develops practices aimed at controlling the consumption of single-use plastics;
- 3.3.8. effectively manages waste disposal and recovery systems;
- 3.3.9. plans and manages circular use of resources; and
- 3.3.10. encourages the use of recycled materials.

3.4. The Company, with respect to the efficient use of resources:

- 3.4.1. seeks to ensure the effective and efficient use of raw materials, energy and water resources throughout all its processes;
- 3.4.2. conducts needs and risk analyses related to resource efficiency and ensures the more effective use of resources;
- 3.4.3. supports the efficient use of water and other natural resources through technological infrastructure and awareness-raising activities;
- 3.4.5. develops practices aimed at preventing waste by ensuring the effective use of project inputs; and
- 3.4.5. contributes to the circular economy by ensuring that waste is incorporated into recycling systems.

3.5. The Company, with respect to water management:

- 3.5.1. undertakes efforts to reduce its water footprint and improve water efficiency;
- 3.5.2. conducts analyses and develops action plans aimed at improving water efficiency throughout the supply chain;
- 3.5.3. establishes systems for monitoring and reporting water pollution;
- 3.5.4. assesses the impacts of its activities on water resources and takes the necessary measures and implements the necessary improvements;

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- 3.5.5. undertakes efforts aimed at raising employees' awareness regarding the protection of water resources;
- 3.5.6. develops practices aimed at controlling and improving water consumption;
- 3.5.7. continuously monitors its impacts on water resources and establishes improvement objectives; and
- 3.5.8. shares transparent information with stakeholders regarding water use and efficiency.

ARTICLE 4. CONTACT

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ARTICLE 5. REVIEW

This Policy shall be reviewed by the Sustainability Committee annually or in the event of a significant change in the applicable legislation, the activities of the Companies or their organizational structure, taking into account changes in processes and technical infrastructure. The Policy, once reviewed and updated where necessary, shall enter into force on the date of its publication upon approval by the Board of Directors.

ARTICLE 6. EFFECTIVE DATE

This Policy was adopted pursuant to the resolution of Akfen Holding's Board of Directors dated 10.09.2026 and entered into force on the date of its publication.

This Policy shall remain in force unless repealed or amended by the Board of Directors.

ARTICLE 7. RELATED POLICIES AND PROCEDURES

Climate Change Mitigation and Adaptation Policy
Occupational Health and Safety Policy
Biodiversity Policy
Supply Chain Policy