

	CLIMATE CHANGE MITIGATION AND ADAPTATION POLICY	Document Code	HOL-SUR-POL-03
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CLIMATE CHANGE MITIGATION AND ADAPTATION POLICY

ARTICLE 1. PURPOSE AND SCOPE

The purpose of this Climate Change Mitigation and Adaptation Policy (the “Policy”) is to establish and define the general principles and implementation guidelines 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 climate change mitigation and adaptation processes.

The Policy provides a framework for efforts aimed at reducing greenhouse gas emissions, assessing climate-related risks and opportunities, improving resource efficiency, supporting the transition to a low-carbon economy and strengthening adaptation capacity against the potential impacts of climate change.

The Policy covers the Companies’ approach to climate change mitigation and adaptation across their areas of operation, operational processes and value chain. Accordingly, employees, suppliers, subcontractors, business partners and relevant stakeholders are expected to contribute to the climate change mitigation and adaptation approach.

Akfen Holding addresses climate change mitigation and adaptation alongside its environmental, sustainability, resource efficiency, energy management, waste management, supply chain and risk management processes.

ARTICLE 2. DEFINITIONS

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

Greenhouse Gas Emissions refer to the release into the atmosphere of gases that cause climate change, such as carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O) and similar gases.

Climate Change Mitigation refers to efforts aimed at reducing greenhouse gas emissions, improving energy efficiency and promoting the wider adoption of low-carbon practices.

Climate Change Adaptation refers to efforts aimed at enhancing resilience against the existing and potential physical impacts of climate change, mitigating risks and assessing opportunities.

Physical Risks refer to risks that may arise from climate-related impacts such as extreme weather events, rising temperatures, floods, droughts, storms and water stress.

Transition Risks refer to risks that may arise from changes in the applicable legislation, markets, technology, reputation and business models during the transition to a low-carbon economy.

Net Zero refers to achieving net-zero total emissions through the reduction and balancing of greenhouse gas emissions.

Low-Carbon Economy refers to an economic transformation approach aimed at conducting economic activities in a manner that generates lower greenhouse gas emissions.

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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.

Resource Efficiency refers to the use of energy, water, raw materials and other natural resources in a manner that provides greater benefits with lower consumption.

Sustainable Development Goals refer to the global goals established by the United Nations that support the environmental, social and economic dimensions of sustainable development.

ARTICLE 3. PRINCIPLES AND GUIDELINES

- 3.1. Climate change mitigation and adaptation are regarded as one of the key priorities in terms of managing the environmental impacts of activities and strengthening the long-term sustainability approach.
- 3.2. It is essential that the climate change mitigation and adaptation approach be taken into consideration across areas of operation and operational processes. In this context, climate change-related risks and opportunities are expected to be taken into account in decision-making and implementation processes.
- 3.3. It is essential that matters relating to climate change mitigation and adaptation be addressed by the relevant governance structures, including the Board of Directors and the Sustainability Committee. These processes are monitored through a multidisciplinary approach with the contribution of the relevant departments.
- 3.4. Efforts aimed at identifying, assessing and managing climate change-related physical and transition risks are encouraged. Actions relating to such risks are expected to be developed in accordance with the nature of the relevant activities.
- 3.5. The development of practices that contribute to the reduction of greenhouse gas emissions is supported. The implementation of processes for measuring, monitoring, assessing and reporting emissions is promoted.
- 3.6. Energy efficiency and resource efficiency are expected to be taken into consideration in operational and project processes. Within this scope, the identification and development of efficiency-oriented practices are supported.
- 3.7. The assessment of low-carbon practices and areas for improvement that may enhance operational efficiency is encouraged.
- 3.8. The assessment of practices that may contribute to the use of renewable energy is supported.
- 3.9. The establishment of short-, medium- and long-term objectives within the scope of climate change mitigation and adaptation is supported. Such objectives are expected to be developed in line with the Companies' areas of operation, operational priorities and sustainability strategy.

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- 3.10.** The establishment of medium-term climate targets for 2030 is supported.
- 3.11.** The development of medium- to long-term climate targets for 2040 is encouraged.
- 3.12.** It is essential to establish a long-term transformation approach that supports the achievement of the net-zero emissions target by 2050.
- 3.13.** Within the scope of climate change adaptation, climate-related impacts in the areas where activities are carried out are expected to be assessed, and measures and areas for improvement aimed at enhancing resilience are expected to be identified.
- 3.14.** The consideration of the climate change mitigation and adaptation approach in supply chain processes is supported. Suppliers are expected to be made aware of climate change, and areas for improvement are expected to be assessed.
- 3.15.** The consideration of emission impacts in logistics and supply processes and, to the extent possible, the assessment of efficient operational models are supported.
- 3.16.** Activities aimed at raising awareness among employees, suppliers, business partners and relevant stakeholders regarding climate change mitigation and adaptation are encouraged.
- 3.17.** Collaboration with relevant stakeholders in the field of climate change mitigation and adaptation is supported. The assessment of such collaborations for the purposes of knowledge sharing, capacity building and the development of joint solutions is promoted.
- 3.18.** The monitoring of climate change-related performance, targets, practices, risks and opportunities in accordance with the principles of transparency and accountability, as well as the sharing of such information with stakeholders, are supported.
- 3.19.** The development of practices supporting climate change mitigation and adaptation is encouraged across areas of operation, project processes and collaborations with relevant stakeholders. Within this scope, due consideration is given to contributing to **SDG 17 – Partnerships for the Goals** through the development of joint solutions and stakeholder collaborations aimed at climate action, with particular emphasis on **SDG 13 – Climate Action**.
- 3.20.** It is essential that the practices, targets and areas for improvement within the scope of the Policy be reviewed regularly and further developed in line with the principle of continuous improvement.

ARTICLE 4. DUTIES AND RESPONSIBILITIES

- 4.1.** The monitoring of the implementation of the Policy, the assessment of relevant targets and practices, and the identification of necessary update requirements are overseen by the Sustainability Committee.

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- 4.2. The relevant departments monitor targets, practices and areas for improvement related to climate change mitigation and adaptation within the scope of their respective duties.
- 4.3. Project and operational departments are responsible for assessing climate change-related risks and opportunities within the scope of their activities and for considering the necessary actions.
- 4.4. Within the scope of procurement and supply processes, the Procurement and Quality Systems Department contributes to ensuring that the climate change mitigation and adaptation approach is taken into consideration throughout the supply chain.
- 4.5. Employees are expected to act in accordance with the principles and guidelines set out in this Policy within the scope of their duties.
- 4.6. Suppliers, subcontractors and business partners are expected to comply with the climate change mitigation and adaptation approach within the scope of their activities.

ARTICLE 5. CONTACT

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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. 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 8. RELATED POLICIES AND PROCEDURES

Environmental Policy
Resource Efficiency Policy
Supply Chain Policy