

	BIODIVERSITY CONSERVATION POLICY	Document Code	HOL-SUR-POL-05
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BIODIVERSITY CONSERVATION POLICY

ARTICLE 1. PURPOSE AND SCOPE

The purpose of this Biodiversity Conservation 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 biodiversity and ecosystem management processes.

Akfen Holding recognizes biodiversity as a fundamental value for the sustainability of life and the continuity of natural ecosystems. Accordingly, it aims to integrate the approach to biodiversity conservation into all activities, investment decisions and project processes; to prevent and minimize adverse impacts on biodiversity and ecosystems to the extent possible; and, where appropriate, to take the necessary actions for their remediation.

The Policy covers biodiversity-related matters addressed in conjunction with the Environmental Policy and its related sub-policies.

The Companies support efforts to mitigate the impacts of their activities and projects on biodiversity and ecosystems and to raise awareness among relevant stakeholders in this regard.

ARTICLE 2. DEFINITIONS

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

Biodiversity refers to the diversity of life in all its forms and at every level. Although the term “biodiversity” encompasses everything that collectively constitutes biological diversity on Earth, from genes to species and ecosystems, it is generally used to refer to the diversity of plant and animal species.

Ecosystem refers to the system consisting of the interactions between living organisms and the natural environment in which they exist.

Fauna and Flora: Fauna refers to the animal species living in a particular region, while flora refers to the plant species found in a particular region.

Supply Chain refers to the suppliers, business partners and related activities involved in the processes extending from the procurement of products and services to their use.

Stakeholders refer to employees, suppliers, local communities and other relevant parties that are affected by, or affect, the activities of the Companies.

ARTICLE 3. PRINCIPLES AND GUIDELINES

3.1. The Companies base their activities and project processes on the protection of natural habitats and the prevention or minimization of adverse impacts on ecosystems.

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- 3.2. The protection of natural habitats in the areas where the Companies operate is prioritized, and practices aimed at preventing and minimizing adverse impacts on biodiversity and, where appropriate, rehabilitating affected areas are encouraged. Projects and activities are expected to be carried out in harmony with nature. Accordingly, the efficient use of natural resources, the mitigation of environmental impacts throughout the entire cycle from production to material circulation, and the development of environmentally compatible practices in the areas where the Companies operate is promoted and supported.
- 3.3. In project processes, the environmental characteristics and biodiversity status of the area in which activities are planned to be carried out are assessed. The necessary permitting processes are taken into consideration for the protection of fauna and flora, and project planning is carried out in line with these assessments.
- 3.4. Prior to projects, information obtained from academics, expert organizations, relevant public authorities and local communities regarding the biodiversity status of the area in which activities are planned to be carried out is taken into consideration in project assessment and implementation processes.
- 3.5. The implementation of risk analysis, monitoring and reporting practices aimed at identifying potential impacts on biodiversity and ecosystems is encouraged. This approach is supported through biodiversity monitoring, observation and action planning processes, in accordance with the nature of the relevant areas of operation.
- 3.6. The protection of natural habitats is supported, and, where appropriate, practices that contribute to habitat improvement and rehabilitation are encouraged. The development of practices that may contribute to the conservation of biodiversity in project sites and areas of operation is also supported. Within this scope, the consideration of practices such as wildlife conservation, restoration of natural habitats, afforestation, landscaping, green spaces, green roofs, and planting in harmony with the natural environment is encouraged.
- 3.7. In landscaping and site development activities, the selection of species compatible with the natural characteristics of the regions where activities are carried out and consideration of local ecological conditions are supported. Within this scope, practices that contribute to the adaptation of vegetation to its surrounding environment and support biodiversity are expected to be developed.
- 3.8. Avoiding practices that may harm biodiversity is essential. The preference for products, services and practices that take biodiversity into consideration is also supported throughout supply chain processes.
- 3.9. Projects are planned and developed in a manner that creates the lowest possible impact on biodiversity and ecosystems. Accordingly, opportunities for improvement aimed at mitigating environmental impacts are expected to be assessed from the project design stage through to implementation.
- 3.10. Employees, suppliers, business partners and relevant stakeholders are encouraged to act in compliance with the principles and guidelines set out in this Policy. In this regard, activities aimed at raising awareness in project sites and areas of operation are supported.

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3.11. Biodiversity management is not limited solely to the initial stage of a project; it is addressed in conjunction with the processes of planning, implementing, monitoring and improving activities, as well as raising stakeholder awareness.

ARTICLE 4. DUTIES AND RESPONSIBILITIES

Project and operational units are responsible for assessing the impacts of their activities on biodiversity and ecosystems and for taking the necessary measures. Employees are expected to act in accordance with the principles and guidelines set out in this Policy. Suppliers and business partners are expected to comply with the approach adopted for the conservation of biodiversity.

ARTICLE 5. CONTACT

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ARTICLE 6. 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 7. 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 8. RELATED POLICIES AND PROCEDURES

Environmental Policy
Climate Change Mitigation and Adaptation Policy
Sustainable Supply Chain Policy