

NUROL HOLDING SUSTAINABILITY POLICY

At Nurol Holding, we design our business models with the goal of creating value for our country and the world, guided by global sustainability principles across all sectors of operation. In shaping our future strategy, we integrate ecosystem protection into our sustainability goals while simultaneously adopting a holistic approach to managing the environmental, social, and economic impacts of our operations. We place significant importance on ensuring that our operations across the construction, defense industry, energy, finance, mining, and tourism sectors align with our sustainability vision, and we strive towards leaving a world that is more livable, equitable, and environmentally cleaner for future generations. In line with our sustainability strategy and priorities, we set short, medium, and long-term goals and regularly communicate our performance to stakeholders, upholding the principle of transparency.

We are dedicated to implementing sustainability management and closely monitoring our sustainability performance through the Sustainability Committee, with regular reporting to our senior management. We believe that our sustainability strategy can be made effective through collaborative efforts, and we encourage our employees, customers, suppliers/subcontractors, local communities, and other stakeholders to embrace and actively participate in our sustainability goals. Our goal is to shape a future where our sustainability principles are embraced by stakeholders at every level and form the core of our business practices. Within the framework of our sustainability approach, we embrace "Environmental Development" with our approach to protecting our world, "Social Development" with our social awareness approach, and "Economic Development" with our inclusive governance model.

For Inclusive Governance, we incorporate our Holding companies' efforts in this realm within their Sustainability Reports, in harmony with the principles outlined by the United Nations Global Compact, of which we became signatories in 2018. Ensuring a sustainable governance model in the long term, we prioritize economic sustainability and adhere to the following principles:

- To align all activities with the United Nations Sustainable Development Goals and adhere to the 10 Principles of the United Nations Global Compact,
- To proactively identify and mitigate financial risks to ensure profitability and improve financial performance,
- To conduct all business relations in accordance with recognized ethical standards and maintain a zero-tolerance policy towards corruption,
- To promote the utilization and advancement of innovative technologies contributing to sustainable development,
- To share sustainability efforts and experiences with stakeholders and global communities through partnerships and active involvement in international initiatives,

- To adopt an approach centered on sharing corporate values and impacts with stakeholders, guided by the principles of accountability and transparency.

To ensure a Healthy World, recognizing our responsibility to the environment and society, we are dedicated to implementing the following principles in our operations to reduce our environmental footprint, particularly in combatting climate change:

- To minimize climate change impacts, natural resource consumption, carbon and water footprints, and waste generation across our value chain, and to consistently monitor and improve our business processes to enhance operational efficiency,
- To calculate our corporate carbon footprint and establish emissions reduction targets,
- To identify improvement areas based on obtained results, implement necessary actions with a continuous improvement approach, and follow certification processes that will improve sustainability efforts,
- To monitor and optimize our water consumption, ensuring its efficient use, while also raising awareness among our employees and stakeholders regarding this critical issue,
- To develop and implement practices aimed at reducing our operational energy consumption, while actively investing in renewable energy sources to contribute to Türkiye's 2053 Net Zero Goal,
- To develop a waste management strategy that safeguards both the environment and human health by implementing zero waste practices, promoting source separation, to contribute to a more sustainable use of natural resources, and to strive for a cleaner future by minimizing the environmental impact of waste,
- To responsibly dispose of chemicals resulting from our activities to prevent any negative environmental and social impacts,
- To continuously monitor and improve our business processes to protect biodiversity.

For Social Development, we are committed to adopting the following principles in our activities to act responsibly towards all our stakeholders, especially our employees, customers, and suppliers/subcontractors, and to minimize our social impacts:

- To create an environment that champions universal human and employee rights across all the countries in which we operate, recognizing our employees as our most invaluable asset, to stand firmly against all forms of discrimination, to ensure equal opportunities in every sphere, guided by our principles of equality and inclusion, to foster an inclusive and secure work environment that upholds human rights, provides fair and equal opportunities, and prioritizes employee satisfaction,
- To ensure the health and safety of all our employees by fully implementing the legislation on occupational health and safety while also considering internationally recognized practices,
- To receive and evaluate our employees' opinions and suggestions, promoting transparent communication by sharing our feedback and proposed solutions to maintain the highest level of employee satisfaction,
- To prioritize customer satisfaction and to enhance our product and service quality through continuous development and a customer-oriented approach,
- To ensure that our suppliers and subcontractors adhere to the responsible supply chain perspective we adopt, to mitigate environmental and social risks across our supply

chain, and to implement our procurement process in accordance with the management principles we have identified,

- To prioritize local employment and the development of the local economy in the regions we operate,
- To maintain our growth target in a manner that contributes to the socio-economic development of society and to support development through various social investment projects in the fields of education, culture, arts, sports, and environment conservation,
- To contribute to society through our corporate social responsibility projects, and to prioritize collaborative initiatives with our stakeholders, with a particular focus on education, sports, culture, and the arts,
- To increase awareness of climate change, sustainability, and the United Nations Sustainable Development Goals among both our employees and stakeholders,
- To promote gender equality in the workplace and to increase women's employment,
- To develop internal communication and training programs aimed at increasing awareness of sustainability among our employees, suppliers, and customers, and to encourage all our operational stakeholders to adopt work principles aligned with this Policy to improve their sustainability performance.

This Policy is subject to periodic reviews and updated as required, with the Nurool Holding Corporate Communications and Sustainability Department being responsible for its updates. It was approved by the Board of Directors of Nurool Holding Inc. on 25.04.2024 with decision number 2024/6 and came into effect on the same date.