

1. Context

Enerjisa Üretim's adherence to Environmental, Social, and Governance (ESG) principles is characterized by stringent integrity, proactive environmental guardianship, and a robust commitment to social responsibility. Our strategies for climate action align with the Paris Agreement, which Türkiye has ratified, focusing on emission reduction and the integration of sustainable practices throughout our operations. As we move towards a low-carbon economy, we are dedicated to facilitating a just transition, prioritizing equitable and inclusive treatment of communities. This includes retraining the workforce and expanding economic opportunities to foster socio-economic resilience.

Our sustainability approach is designed to provide energy solutions that are not only clean and reliable but also economically viable, promoting simultaneous environmental and social advancement. This comprehensive approach underscores our commitment to addressing global challenges through scientifically substantiated and integrated methods. Our ESG Policy is rigorously implemented across all stages of our operations—development, construction, and generation - to ensure congruence with the environmental and social contexts in which we operate.

We acknowledge and commit to the following overarching principles that guide our operations and strategic decisions. As an organization, we strive to integrate these core values into every facet of our activities, ensuring that our commitment to ESG principles is not only evident but also foundational to our business model. These principles set the stage for detailed policies and practices that are designed to minimize our environmental footprint, embrace sustainable development, and promote social equity. The sections below elaborate on these commitments, describing our systematic approach to implementing rigorous environmental and social standards, our strategies for engaging with and benefiting communities, and the governance structures that support our sustainability objectives. Each commitment represents our dedication to driving positive change and exemplifies our role as a proactive participant in the global movement towards a sustainable and equitable future.

Prepared by	Orçun Yıldızca	Revision No.	0
Approval	Murat Eröz, İhsan Erbil Bayçöl	Revision Date	09.01.2025
Issue Date	09.01.2025	Revision Purpose	New Document

2. Environmental Stewardship and Climate Change Mitigation

- 2.1. We adhere to national and international environmental standards and engage proactively in environmental initiatives, setting a precedent for environmental stewardship that transcends mere legal compliance.
- 2.2. Our core business strategies and new developments are fundamentally aligned with climate change mitigation and the integration of low carbon technologies.
- 2.3. We assess and address climate-related physical and transitional risks to enhance the resilience of our operations and advance our adaptation strategies for both acute and chronic physical risks.
- 2.4. We are dedicated to achieving no net loss of biodiversity and ecosystems, protecting the integrity of legally designated conservation areas, abstaining from activities that diminish their ecological value, and striving for a net positive ecological impact.
- 2.5. We implement measures to mitigate adverse impacts on endangered and protected species while ensuring the long-term preservation of natural ecosystems.
- 2.6. We proactively manage environmental impacts at their source and undertake regenerative measures when necessary.
- 2.7. We engage with our value chain, particularly local communities and employees in operational regions, to collaborate on expanding environmental knowledge.
- 2.8. We endorse a waste minimization strategy through robust waste management plans, adopting the waste hierarchy approach and selecting materials and services based on life cycle assessments.
- 2.9. We commit to responsible water use, aiming to reduce water withdrawal in water-scarce areas and support the preservation of freshwater ecosystems through sustainable practices.
- 2.10. We implement stringent controls to mitigate and eliminate pollution from our operations, impacting water, land, and soil.
- 2.11. We rigorously evaluate all environmental data to assess risks and opportunities associated with our environmental dependencies and impacts.
- 2.12. We recognize the cultural heritage assets of Türkiye as pivotal elements of national identity, cohesion, and historical understanding, ensuring their protection and sustainability within our operational scope.

Prepared by	Orçun Yıldızca	Revision No.	0
Approval	Murat Eröz, İhsan Erbil Bayçöl	Revision Date	
Issue Date	09.01.2025	Revision Purpose	New Document

- 2.13. We integrate national requirements and international best practices into our business operations across the entire value chain.
- 2.14. We are committed to reducing greenhouse gas emissions, emission intensity, and energy consumption, targeting net zero status by no later than 2045.
- 2.15. Our investments are exclusively in renewable energy, with a firm policy against expanding fossil fuel capacity.
- 2.16. We continually enhance our energy performance across all activities, supporting development with energy-efficient products, services, and designs.

3. Social Commitments

- 3.1. We ensure equitable treatment of all employees, contractors, subcontractors, and stakeholders within the framework established by the laws of the Republic of Türkiye, international law, and prevailing ethical codes.
- 3.1.1. In our recruitment and contractor selection processes, we strictly prohibit discrimination based on personal characteristics and preferences including, but not limited to, gender, age, race, nationality, political opinion, religion or belief, language, ethnicity, marital status, sexual orientation, disability, or union affiliation.
- 3.1.2. We uphold the principle of fairness and equal opportunity in aspects such as working conditions, appointments, promotions, remuneration (inclusive of fringe benefits), discipline, and dismissal, committing to the principle of "equal pay for equal work."
- 3.1.3. Proactive measures are taken to prevent or identify instances of harassment and abuse, including gender-based violence and harassment (GBVH), sexual exploitation and abuse (SEA), sexual harassment (SH), bullying, intimidation, and violence.
- 3.1.4. The employment of child labor or forced labor is strictly prohibited, and we expect the same commitment from our suppliers and subcontractors.
- 3.2. We respect and protect the fundamental principles and rights at work for our employees. This includes the right to elect workers' representation, form or join workers' organizations, affiliate with unions, or engage in collective bargaining, without discrimination against those involved in such activities.

Prepared by	Orçun Yıldızca	Revision No.	0
Approval	Murat Eröz, İhsan Erbil Bayçöl	Revision Date	
Issue Date	09.01.2025	Revision Purpose	New Document

- 3.3. Adherence to the principles of the UN International Labour Organization (ILO) is a cornerstone of our commitment to ensure fair labour practices.
- 3.4. Development of applications that cater to the comprehensive needs of all employees, aiming to contribute skilled and knowledgeable personnel to the energy sector. We embrace technological advancements, integrating them effectively into our operations with the active participation of our workforce.
- 3.5. We are committed to maintaining open communication and fostering continuous engagement with our employees, contractors, subcontractors, and stakeholders.
- 3.6. We empower employees distinguished by their leadership competencies or technical expertise and foster teamwork and cooperation among all employees through a culture of feedback and performance evaluation.
- 3.7. Strategies are developed to maximize the value derived from our activities across their entire lifecycles, creating sustainable value for our stakeholders.
- 3.8. We pledge to honor the dignity, human rights, aspirations, cultures, and natural resource-dependent livelihoods of indigenous peoples. In projects that impact indigenous communities, we commit to facilitating their knowledgeable involvement.
- 3.9. We actively monitor and address inquiries, suggestions, requests, and grievances from our stakeholders, employees, and the communities around our operational sites, adhering to our grievance mechanism and responding within reasonable timeframes.
- 3.10. We strive to establish respectful and benevolent neighborly relations, grounded in goodwill and mutual trust, considering the values and needs of local communities impacted by our activities.
- 3.11. Compliance with legislative requirements and international best practices is rigorously maintained during land acquisition processes in our developments.
- 3.12. We endeavor to avoid or mitigate adverse social and economic impacts from involuntary resettlement, exploring alternative project designs, providing fair compensation, and engaging in meaningful consultations to assess and mitigate environmental, social, health, safety and security risks to affected communities.
- 3.13. All activities are conducted with respect for internationally recognized human rights, as delineated in instruments such as the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the ILO Core Labour Standards.

Prepared by	Orçun Yıldızca	Revision No.	0
Approval	Murat Eröz, İhsan Erbil Bayçöl	Revision Date	
Issue Date	09.01.2025	Revision Purpose	New Document

3.14. We implement measures to ensure the health and safety of the local communities that may be affected by the company's operations, including emergency preparedness and response systems.

4. Governance

4.1. We commit to upholding the highest standards of integrity and transparency in all our operations, strictly adhering to legal, ethical, and regulatory requirements across all jurisdictions in which we operate.

4.2. We will provide comprehensive and transparent reporting on our ESG initiatives and outcomes annually, utilizing recognized frameworks such as the Global Reporting Initiative (GRI) to ensure accountability and clarity for all stakeholders.

4.3. Executive compensation will be directly linked to the achievement of ESG targets, ensuring that our leadership is highly motivated to drive performance in sustainability that benefits all stakeholders.

4.4. A dedicated Sustainability Management Committee reporting to a Sustainability Steering Committee will focus on ESG matters, tasked with the regular review and guidance on the company's sustainability strategies, ensuring they are robust, effective, and forward-looking.

4.5. We will proactively engage with stakeholders through established channels to gather insights and feedback, which will inform our ESG strategies and corporate decision-making processes.

4.6. Our succession planning process includes considerations for maintaining continuity in ESG leadership and capabilities, ensuring resilience and ongoing commitment to our ESG objectives.

4.7. We enforce a zero-tolerance framework against corruption and unethical behavior, including bribery, fraud, and any financial misconduct.

4.8. Full adherence to tax regulations in operational countries and compliance with relevant international standards are ensured to maintain comprehensive tax compliance.

4.9. Our business operations comply with competition laws and regulations, eschewing practices that restrict competition and upholding transparency and integrity in market interactions.

Prepared by	Orçun Yıldızca	Revision No.	0
Approval	Murat Eröz, İhsan Erbil Bayçöl	Revision Date	
Issue Date	09.01.2025	Revision Purpose	New Document

4.10. Adherence to the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct concerning anti-corruption & anti-bribery, taxation, and fair competition is stringently followed.

5. Implementation of Policy

- 5.1. We ensure compliance with our Environmental and Social Management System (ESMS) across all activities through continuous monitoring, regular reporting, and review mechanisms, thereby affirming alignment with this Policy.
- 5.2. As signatories to the United Nations Global Compact, we are committed to upholding its 10 Principles and recognize the United Nations Sustainable Development Goals (SDGs) as guiding frameworks for our operations.
- 5.3. In our investment initiatives, we adhere to the standards delineated in the International Finance Corporation (IFC) Performance Standards and Guidelines, as well as the Environmental and Social Policy of the European Bank for Reconstruction and Development (EBRD).
- 5.4. We also benchmark against sector-specific guidelines to establish environmental and social objectives at the preliminary design and implementation phases of our projects, ensuring industry best practices.
- 5.5. Annually, we transparently disclose our Environmental, Social, and Governance (ESG) objectives and associated activities in our sustainability report, overseen by the Sustainability Management Committee and executive leadership to ensure robust policy implementation.
- 5.6. Executive compensation packages are structured to be contingent upon the achievement of specified ESG targets, aligning leadership incentives with our sustainability commitments.
- 5.7. We provide necessary training programs to our employees, aligned with our environmental and social responsibilities.
- 5.8. Employees at all organizational levels bear responsibility for adhering to these commitments, contributing actively to the attainment of our environmental and social objectives.

Prepared by	Orçun Yıldızca	Revision No.	0
Approval	Murat Eröz, İhsan Erbil Bayçöl	Revision Date	
Issue Date	09.01.2025	Revision Purpose	New Document

- 5.9. All stakeholders within Enerjisa Üretim are encouraged and empowered to report any instances of non-compliance with our ESG Policy and any concerns regarding greenwashing, in accordance with our Grievance Mechanism Procedure.
- 5.10. This policy is subject to a biennial review and update to integrate evolving best practices and stakeholder feedback, ensuring that it remains dynamic and consistent with international standards.
- 5.11. We are committed to the regular integration of emerging technologies and innovations into our ESG strategy, enhancing the effectiveness, efficiency, and transparency with which we achieve our sustainability goals.

Prepared by	Orçun Yıldızca	Revision No.	0
Approval	Murat Eröz, İhsan Erbil Bayçöl	Revision Date	
Issue Date	09.01.2025	Revision Purpose	New Document