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|  | <b>HSE and Sustainability Handbook</b> | Document No:      | AE.SEÇ.EK.001 |
|   |  | Revision No:      | 0             |
|   |  | Date of Revision: | 18.08.2023    |
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## 1. PURPOSE

The purpose of this handbook is to create a framework for Aydem Holding A.Ş. and its affiliated Holding Companies to create, implement, maintain and develop a HSE and Sustainability (HSE&S) System in accordance with the national and international standards and legislations.

## 2. SCOPE

HSE and Sustainability Handbook covers all employees and workplaces of Aydem Holding A.Ş. and the affiliated Holding Companies.

## 3. DEFINITIONS AND ABBREVIATIONS

**Aydem Energy Group:** means Aydem Holding A.Ş. and all affiliated group companies.

**EIA:** means Environmental Impact Assessment

**OHS:** means Occupational Health and Safety

**HSE&S:** means Health, Safety, Environment and Sustainability

**Personal Protective Equipment (PPE):** means all clothes, tools, equipment and devices, etc., which protect the employee against one or more risks that arise from the work executed and that affect health and safety and which are worn, attached or held by the employee and designed according to this purpose.

**Near Miss Incident:** means an incident that occurs at the workplace and has potential to cause damage, but does not cause any damage to the employees, workplaces or working equipment.

**Risk:** means the possibility of loss, injury or other harmful consequences arising from hazard.

**Hazard:** means the potential to cause harm or damage, existing in the workplace or may derive from outside and may affect the employee or the workplace.

## 4. HSE AND SUSTAINABILITY MANAGEMENT SYSTEM

### 4.1. Management System Structure

The HSE and Sustainability Management System Structure is compatible with other management system standards, presenting a framework that will ensure consistent implementation of procedures and practices and fulfilling the requirements of the national legal legislation.

The HSE Management System approach implemented at Aydem Energy Group is based upon the Plan-Do-Check-Act (PDCA) approach. The PDCA approach is an iterative process used to ensure continuous improvement. This process is applied to the management system and each element of it as follows:

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**Plan:** Determining the HSE&S targets and the necessary processes that will enable the Company to obtain results in accordance with the HSE&S policy by assessing the HSE&S risks and opportunities and other risks and opportunities.

**Do:** Implementing the processes as planned.

**Check:** Checking the conformity of the activities executed in the implementation phase with the activities determined in the planning phase. Activities and processes are monitored according to the HSE&S policy and HSE&S targets, and the results are reported through performance assessment and management review.

**Act:** Ensuring the continuous improvement of performance and taking the necessary measures to achieve the intended results. Corrective and remedial actions are taken and continuously monitored in relation with all non-conformities identified during the control phase.

As shown in the Figure 1, the PDCA approach shapes the structure of the HSE&S Management System.

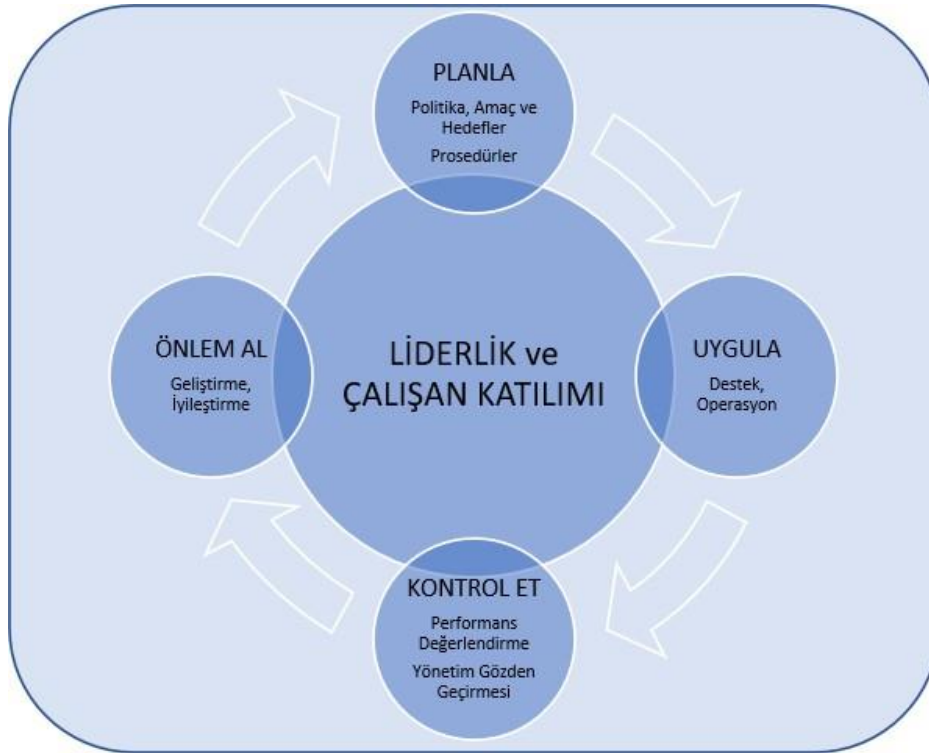
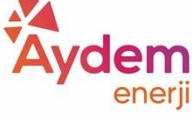


Figure-1: HSE&S Management System Structure

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#### 4.2. Policy

As Aydem Energy, Turkey's leading energy company, our top priority is to provide a healthy and reliable working environment for all our employees by ensuring the highest standards in our company management and to act with environmental awareness in our internal and external activities.


We manage and organize our processes by integrating the concept of sustainability, which we deal with all its environmental, social and governance aspects, into our business processes and taking our way of doing business in an environmentally and human-friendly manner as the basis of all our activities.

While we continue all our activities through our 'sustainable', 'innovative' and 'human-oriented' approach for the future of the society that we serve; we, together with our 6 companies, have signed the United Nations Global Compact, the largest sustainability initiative in the world with over 15.000 company members in more than 160 countries.

Our HSE and Sustainability Policy, which aims to bring all our stakeholders together to achieve the same purpose, consists of the following items:

- Create and improve efficient management systems in all processes within our Company in order to provide sustainable services at the level of national and international standards,
- Develop our sustainability strategies in full adherence to ethical rules, anti-corruption and compliance principles,
- Create a culture where safe and healthy working habits are adopted and provide the necessary resources,
- Integrate the risk management process holistically into all our business processes and take proactive measures,
- Prefer environmentally-friendly and energy-efficient products, services and technologies and implement our investments and activities by taking their impacts on the environmental, social, natural and cultural heritage into consideration,
- Pay maximum attention to protect the environment and prevent pollution from a sustainable development perspective and improve our recycling methods by reducing wastes at their source,
- Increase the loyalty and welfare of our employees, provide equal opportunities and maximize employee participation in order to ensure sustainable efficiency,
- Follow up sustainability criteria in our supply chain and strive to spread awareness about sustainability across our entire value chain,
- Provide the necessary resources by taking the expectations of our stakeholders about sustainability issues into consideration and integrate sustainability into all organizational levels of our Company,
- Continue to serve the society and maintain our cooperation based on our corporate social responsibility approach.

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### 4.3. Targets

The HSE and Sustainability Group Directorate of Aydem Holding A.Ş. determines annual targets. The criteria used to determine the annual targets of the Department are as follows:

- To ensure that the targets are not complicated but applicable, each group company is required to determine 5 periodically-measurable, reportable and provable HSE&S targets that it believes will benefit itself, and to report them to the HSE&S Group Directorate until the end of the year.

While these targets cover the following fundamental targets:

- Minimizing accident frequency rates,
- Reducing waste and carbon emissions,
- Increasing training hours

they should be determined in accordance with the own characteristics and needs of each operation.

- Apart from the above-mentioned 3 common targets, 1 target should be set with focus on the 3 main topics of sustainability.
- When determining the annual targets, the target values that were determined in the previous year are also taken into consideration. If the target set in the previous year was achieved, the calculations are made for the new annual target, and this annual target is expected to be improved to a certain level. If the previous annual targets were not achieved, a new target is set by assessing the value achieved at the end of that year. After determining the annual targets of Aydem Energy Group, they are submitted to the HSE and Sustainability Group Directorate of Aydem Holding A.Ş. for approval.

### 4.4. Organization

The organizational chart of the HSE and Sustainability Group Directorate of Aydem Holding A.Ş. is outlined below.

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\* Aydem Yenilenebilir Enerji'de olduğu gibi

## 4.5. Duties, Authorizations and Responsibilities

The organizational chart of the HSE&S Group Directorate of Aydem Holding A.Ş. is given in the Section 4.4. According to this chart, the duties, authorizations and responsibilities of department employees and the other positions at Aydem Energy Group are defined in this section.

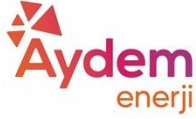
### HSE&S Group Directorate

- Implement all aspects of the HSE&S requirements in accordance with the HSE&S Management System of Aydem Holding A.Ş., contract, scope of work and regulatory framework,
- Prepare the HSE&S targets, HSE&S procedures and other HSE&S documents,
- Maintain the HSE&S records,
- Ensure the recording and currency of legal and other requirements,
- Ensure that HSE&S trainings are provided in accordance with the HSE&S Management System, legal and other requirements,
- Create and implement an efficient HSE&S communication strategy,
- Measure, monitor and report the HSE&S performance,
- Make statistics for and investigate the causes of accidents and near misses that occur at Aydem Energy Group.

### HSE&S Group Director

- Determine the annual HSE&S target indicating the health, safety, environment and sustainability goals every year,
- Ensure the determination of the HSE&S Management System requirements,
- Publish and communicate the annual HSE&S targets to all necessary parties,
- Ensure that the targets and procedures are implemented,

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- Develop the HSE&S training strategy to ensure continuous improvement,
- Make contact with and consult to the department directors and senior management to ensure that they are informed about HSE&S training and development targets,
- Provide guidance to the HSE&S Group Manager and
- Ensure that suitably-documented information is maintained as evidence for competency and training.

### HSE&S Group Manager

- Monitor corrective and remedial actions together with the HSE&S Operations Managers and provide feedback to the HSE&S Group Director regularly,
- Create the HSE&S policy, procedures and guidelines and submit them to the HSE&S Group Director for approval,
- Create, monitor and ensure accurate management of the technical specifications for the service processes such as consulting services etc. to be obtained for HSE&S,
- Prepare the HSE&S training and development plans,
- Lead the specific HSE&S trainings,
- Provide support for the root cause analysis of work accidents and occupational diseases and ensuring that statistics are kept.

### HSE&S Operations Managers

- Follow up national and international HSE&S legislation and ensure that it is implemented,
- Follow up the corrective and remedial actions and report them to the HSE&S Group Directorate,
- Follow up HSE&S policy, procedures and guidelines and ensure compliance with them,
- Ensure that HSE&S trainings are planned in accordance with the relevant legislation and assess their efficiency,
- Ensure that the root cause analyzes of work accidents and occupational diseases are conducted and report them to the HSE&S Group Directorate,
- Monitor the HSE&S activities on site and ensure that these activities are measured and assessed,
- Ensure continuous improvement of the HSE&S performance.

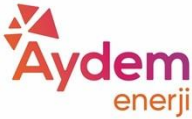
### HSE&S Team

- Provide and report the HSE&S inputs for the HSE&S targets
- Complete the actions in its own field of responsibility regarding the HSE&S targets.

### Instructors

- Provide assistance in the development of training materials,
- Translate the trainings and/or verify the accuracy of third party translations of trainings and
- Provide training.

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### Sustainability Commissions

- Assess the social, environmental and financial activities to be planned within the sustainability framework and submit them to the CEO and/or the relevant general manager for approval.
- To be founded within the group companies by the General Manager, HSE&S Group Director, Financial Affairs Director/Manager, Corporate Communications Executive/Manager, Human Resources Executive/Manager, HSE&S Executive/Manager and/or their representatives. The coordination of this commission will be under the HSE&S Group Directorate.
- These commissions will be created and activated.
- Another goal of the Commission is to include the positive initiatives implemented at our companies but not assessed within the framework of sustainability.

### Employees

- Comply with the Integrated Management Systems and HSE & Sustainability Policy determined by Aydem Energy Group,
- Understand and implement the requirements of the HSE&S Management System related to their own jobs,
- Immediately inform the HSE&S team about the hazards, risks, accidents/incidents in the working areas,
- Stop the work if there is a high risk,
- Know, understand and implement the requirements including the HSE&S and quality requirements, and ask for detailed clarifications from the relevant sources, if necessary,
- Make comments when there are any changes that affect them,
- Participate in hazard identification, risk assessments and determination of the controls,
- Get involved in the development and review of the Health, Safety, Environment and Quality Policy and HSE&S targets,
- Participate in accident investigations,
- Use the necessary PPE.

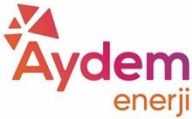
### Subcontractors

- The roles and responsibilities of subcontractors are defined in the Subcontractor Agreements. The subcontractors operating in the field are subject to the practices for the Management System and HSE&S Management at Aydem Holding A.Ş.

### Third Parties

- Third Parties must fully comply with the HSE&S rules and guidelines.

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#### 4.6. Performance Indicators (MPSCF, BBAC etc.)

Aydem Holding A.Ş. prepares monthly and annual reports to monitor performance. Key Performance Indicator (KPI), Monthly Planned Safety Control Form (MPSCF) and Behavior Based Audit Card (BBAC) that are presented on a monthly basis are the examples for these reports.

##### Key Performance Indicator (KPI)

KPI report is presented monthly. 15 days after the end of the month, when the data sent by Aydem Energy Group is completed, the report for that month will be deemed as prepared. This report is prepared by the HSE and Sustainability Group Directorate of Aydem Holding A.Ş. The contents of the report comprise the statistical reporting of the accident data of Aydem Energy Group and the types of accidents that have occurred. The accident statistics that are dealt with are as follows:

- LTI = Lost Time Injury
- TRI = Total Recordable Injuries
- LTIFR = Lost Time Injury Frequency Rate
- TRIFR = Total Recordable/Reportable Incident Frequency Rate
- MTC = Medical Treatment Case
- RWC = Restricted Work Case
- YTD = From the Start of the Selected Period to the Current Status, As of the First Month of the Year (Cumulative Value)

In these reports, particularly the LTI, LTIFR, TRI and TRIFR values of Aydem Energy Group are calculated, and it is assessed how these values have changed on an annual basis and how close they are to the annual target. General accident statistics of contractors are also included in this report, if calculated.

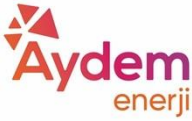
MPSCF, BBAC, Near Miss /Unsafe Situation / Unsafe Behavior, R5 Personal Risk Assessment and training statistics of Aydem Energy Group per personnel are also included in this report and assessed according to the target value.

##### Monthly Plan Safety Control (MPSCF)

MPSCF is prepared by Aydem Energy Group by filling in the Monthly Planned Safety Control Form. It is a form that is filled in on a monthly basis and completed by an authorized officer of the Company. The form includes a checklist. According to these parameters required to be checked with this form, the compatibility of the activities, equipment and procedures of the Company is assessed. The assessment of this form helps to determine the actions that can be taken for improvement.

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Behavior Based Audit (BBA)

Behavior Based Audit is a card in which the positive aspects and improvement aspects of the work performed by employees operating in the workplace are assessed by the auditor. The second section of the card contains a behavior based audit checklist. In this section, the competencies of the employees are assessed regarding general matters such as the use of personal protective equipment (PPE), tools and equipment, working position and permits and trainings. This card is completed by auditors not in the field, but in the office upon return from the field.

**4.7. Discipline and Reward**

Discipline

The Disciplinary Actions Procedure (AE.IK.PRS.009) was created to determine the disciplinary penalties, conditions and standard application procedures for any non-conforming attitude and behavior of the employees of Aydem Holding A.Ş. and its affiliated Holding Companies with the legal legislation, the Code of Ethics and Working Principles and all other approved internal regulations and decisions of the Company (management decisions, regulations, contracts, job descriptions, directives, procedures, guidelines, etc.).

Disciplinary rules have been established to ensure that the activities of the Company are conducted in an efficient, peaceful and orderly manner, to protect well-intentioned employees and to execute the affairs as required and to prevent violations as the ultimate purpose of the sanctions.

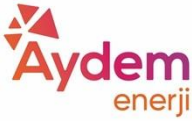
The practices described in the Disciplinary Actions Procedure (AE.IK.PRS.009) cover all employees within Aydem Energy Group. The employees who are members to the Union are assessed according to the provisions of the relevant Collective Labor Agreement applicable at the time of committing the act or behavior.

Regarding the matters that fall into the scope of the implementation of the Disciplinary Actions Procedure; the provisions contained in the document "Structure and Working Order of Ethics Committee and Disciplinary Committees of Aydem Holding A.Ş." about the review of ethical reports, conducting the investigations, the structure, working methods and decision-making authorizations and procedures of Ethics Board and Disciplinary Committees are applied

The Human Resources Management of the relevant Company is responsible for all secretariat and other matters arising from the activities of the Company under the legal legislation within the scope of the Disciplinary Actions Procedure (arrangement of meetings, preparation of decision text, announcements, legal notifications, personnel notifications, personal file activities, archives, etc.).

Without prejudice to, but not limited to the rights arising from the Labor Law No. 4857 and all relevant legislative provisions; the penalties that can be imposed for all acts and behaviors of the employees that require disciplinary penalties are defined in four categories as warning, reprimand, termination of the employment contract with notice for a valid reason and immediate termination of the employment contract without notice for a justified reason, depending upon the severity of the crime or fault.

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As a result of the assessments made according to the nature of the disciplinary action; one or more of the disciplinary penalties prescribed in the procedure may be imposed on the relevant employees.

The acts and situations that require disciplinary penalties are defined in the procedure with the document code AE.IK.PRS.009 based on the disciplinary penalty prescribed according to the severity of the crime or fault.

### Reward

Aydem Holding A.Ş. organizes the determination of targets that will be completed individually by the company, the department where the employee works, and the person. The targets are identified through the İKlim platform of Aydem Holding A.Ş.

Company targets are the general targets defined in the same way for each employee. Department targets and individual targets are entered into the system in agreement with the managers. The performance targets entered are approved by the manager. After these targets are approved by the manager, they are presented to the second level manager and his/her approval is taken. During the interim assessment period, the targets approved by the second level manager are sent back to the employee to make any necessary adjustments, if any. Following the adjustments made by the employee, the approval process is executed again by the manager and the second level manager. At the end of such period, a bonus payment is made to the employee as a reward based on the rate of achieving the targets and the percentage of success. Detailed information about the operations and procedures can be found in the document coded AE.IK.PRS.012.

## **5. PLANNING**

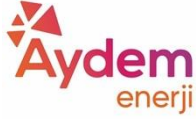
Risk assessment studies are conducted to determine the damages of the existing or external hazards in the workplaces of Aydem Energy Group towards the employees, the workplace and the environment and the measures that can be taken against them, to ensure the health and safety of employees, to prevent/reduce the negative social impacts that might occur and to ensure sustainability.

### **5.1. Identification of Hazards**

During all processes conducted in the workplace, the following information is, as a minimum, collected according to its relevance to the working environment, employees, environment and workplace when identifying the hazards:

- Workplace, buildings and extensions.
- Activities, works and operations conducted in the workplace.
- Production processes and techniques.
- Working equipment.
- Organizational and hierarchical structure, duties, authorizations and responsibilities.
- Experience and opinions of employees.
- Working permit documents to be obtained before employment in accordance with the relevant legislation.
- Education, age, gender and similar characteristics and medical examination records of employees.

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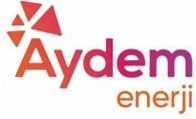
- Groups that require implementation of special policies such as young, elderly, disabled, pregnant or nursing employees, and status of female employees.
- Inspection results of the workplace.
- Occupational disease records.
- Work accident and environmental accident records.
- Records related to the situations that occur in the workplace but do not cause any injury or death, but cause damage to the workplace or working equipment.
- Near miss incident records.
- Previous risk assessment studies, if any.
- Emergency plans.
- Documents required to be prepared in certain workplaces, such as a health and safety plan and explosion protection document.
- Electricity and water consumption records.
- Processes related to residues and wastes.
- Chemical substances used.
- Emission records.
- Ambient and personal exposure level measurement results.
- Material safety data sheets.

While collecting information about hazards; the occupational and environmental accidents and occupational diseases that occur in the workplaces conducting the same or similar activities are also taken into consideration.

In line with the information collected and according to the provisions contained in the legislation on Health, Safety and Environment; hazards that might arise from physical, chemical, biological, psychosocial, ergonomic and similar sources of danger existing in the working environment or as a result of their interactions are determined. While determining these hazards; the following matters, those who will be affected by these matters and how they might be affected are taken into consideration:

- a) Hazards that might arise due to the location of the workplace.
- b) Hazards that might arise from the failure to place the workplace, buildings and extensions in the selected area in accordance with the plan or from making additions that are not included in the plan.
- c) Hazards that might arise from the structure and construction method of the workplace, buildings and extensions and the selected building materials.
- d) Hazards that might arise from the factors such as working procedures, shift arrangement, team work, organization, supervision system, hierarchical order, visitors or other persons who are not the employees of the workplace during all types of activities to be conducted in the workplace, including maintenance and repair works.
- e) Hazards that might arise from the execution of works, production techniques, materials used, machinery and equipment, tools and supplies and the failure to design or use them in accordance with the physical characteristics of the employees.
- f) Hazards that might arise from electrical installation components such as high current, lighting, lightning rod, grounding etc., as well as heating, ventilation, protection against atmospheric and environmental conditions, drainage, treatment, fire prevention and fire-fighting equipment and similar auxiliary installations and equipment.

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- g) Hazards that might arise from the processing, use, handling, storage or disposal of the substances that are likely to burn, ignite or explode in the workplace.
- h) Hygiene conditions of the working environment and hazards that might arise from the personal hygiene habits of employees.
- i) Hazards that might arise from the use of access routes by employees within the workplace.
- j) Hazards that might arise from the failure to receive sufficient training and information by employees regarding occupational health and safety, failure to give suitable instructions to employees or in case of working without a necessary working permit.
- k) If any control, measurement, examination and research studies have not been previously conducted in the workplace regarding the hazards caused by physical, chemical, biological, psychosocial, ergonomic and similar sources of hazard existing in the working environment; all necessary controls, measurements, examinations and researches are conducted to determine the quality and quantity of these hazards and the exposure levels of employees to them for the purpose of using them in risk assessment studies.

### 5.2. Assessment of Risks (HSE&S)

By dealing with each hazard identified in the workplace separately, it is determined how frequently the risks that might arise from these hazards might occur and who, what, in which ways and to what extent of severity they might be harmed by these risks. When determining these risks, the impacts of the existing control measures are also taken into consideration.

The risks identified in line with the collected information and data are analyzed by using one or more of the methods selected based on the factors such as the characteristics of the workplace activities, qualifications of the hazards or risks in the workplace and the restrictions in the workplace or national or international standards.

If the analysis is conducted for the separate sections of the workplace, the results are assessed by taking the interactions of these sections into consideration.

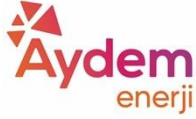
Analyzed risks are listed and written down according to the severity and significance of their impacts starting from the highest risk level, for the purpose of making a decision on control measures.

Risk management in the workplace primarily aims to eliminate the risks as long as they can be sufficiently implemented. In the cases where it is not possible to eliminate the risks, attempts are made to minimize them.

The following points should be taken into consideration for risk assessment:

- It should cover environmental, employee health and safety, workplace and social risks.
- Risk assessment should be conducted at regular intervals, at least once per year.
- Assessment should be conducted particularly at the time of any significant change in the activities.

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- It should be conducted at the same time as any external change occurs, such as enactment of new laws or regulations.
- The contributions of employees and managers at all levels should be involved.
- The contributions of the affected communities and other external stakeholders should be involved.
- Risks should be assessed and given priority according to their likelihood and severity of the impact.
- The monitoring plan should be associated with the prioritized risks.
- In addition to the internal risks, the risks in the supply chain should be also assessed.
- Scaling should be done according to the size and complexity of the organization.

### 5.3. Identifying the Opportunities

By taking the planned changes in the policy, processes and activities into consideration; processes are established and maintained to assess the opportunities for adapting the job, work organization and working environment to employees, the opportunities for eliminating hazards and reducing HSE risks, and the other opportunities for improving the HSE management system.

### 5.4. Environmental Aspects

The environmental aspect of sustainability is related to the impact of the Company on living and non-living natural systems, including land, air, water and ecosystems.

Environmental aspects of a new workplace/method/equipment etc. are prepared during the planning process before they are taken into operation. In case of any changes in the existing workplace or activities where the planning process is conducted very quickly, the review of environmental aspects is conducted together with the study. The frequency of review varies depending upon the significance of the environmental aspect. A review is conducted in case of a positive or negative development for the environmental aspects, where measurement and monitoring are conducted.

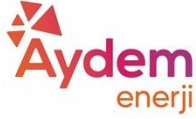
Environmental aspects that are considered within the scope of emergency are subject to continuous review. The frequency of this review is related to the occurrence of the emergency risk, realization of the emergency, implementation of corrective actions and the drills conducted.

A review is also conducted for the environmental aspects that are described in the plans and programs, in which purposes and targets are determined, and for the environmental aspects for which corrective and remedial action is taken.

## 6. ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

Environmental Impact Assessment (EIA) is an assessment procedure that allows for the determination of each significant positive or negative impact that the identified environmental aspects of the Company may cause in the environment, and the identification of the methods and principles to control the determined possible impacts.

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These impacts are determined according to the activities conducted by the Company. These cover each activity, product, operation and service executed by the Company in its offices and in the field.

Each activity and sub-activity is taken into consideration when determining the environmental aspects. After determining the environmental aspects for each sub-activity, the environmental impacts of such environmental aspect are reviewed. The following possible impacts of each environmental aspect are assessed:

- Soil pollution
- Air pollution
- Water pollution
- Changes in flora or fauna
- Consumption of natural resources
- Noise, emissions, leakage, etc.

It is assessed whether such environmental aspect is a significant environmental aspect according to:

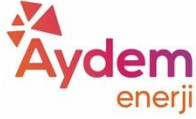
- Impact-significance score of its activities on the environment;
- Sanctions that might be imposed under the legal regulations; and
- Extent of negative impacts on the Environmental Management System of the Company.

Purpose, target and process control method are determined for the clearly-defined significant environmental aspects. In case there are any significant environmental aspects for which the purpose and target cannot be determined, it is sufficient to identify the process control for such aspects.

Size assessment is conducted by using the type-L matrix below. The risk score is calculated by multiplying the points given for the likelihood of occurrence of the environmental aspect and its impact (severity) after it has occurred, and the necessary actions are taken according to the risk action table below.

| LIKELIHOOD    | SEVERITY          |             |              |             |                 |
|---------------|-------------------|-------------|--------------|-------------|-----------------|
|               | 1 (VERY SLIGHT)   | 2 (SLIGHT)  | 3 (MODERATE) | 4 (SEVERE)  | 5 (VERY SEVERE) |
| 1 (VERY LOW)  | 1 NON-SIGNIFICANT | 2 LOW       | 3 LOW        | 4 LOW       | 5 LOW           |
| 2 (LOW)       | 2 LOW             | 4 LOW       | 6 LOW        | 8 MODERATE  | 10 MODERATE     |
| 3 (MODERATE)  | 3 LOW             | 6 LOW       | 9 MODERATE   | 12 MODERATE | 15 HIGH         |
| 4 (HIGH)      | 4 LOW             | 8 MODERATE  | 12 MODERATE  | 16 HIGH     | 20 HIGH         |
| 5 (VERY HIGH) | 5 LOW             | 10 MODERATE | 15 HIGH      | 20 HIGH     | 25 INTOLERABLE  |

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| RISK                                  | ACTION  |
|---------------------------------------|---|
| <b>25 INTOLERABLE RISK</b>            | The activity related to the environmental aspect should be stopped or its impact and risk should be reduced by taking urgent measures. The activity should not be continued until the impact is reduced. If the risk falls into the scope of the consumption of natural resources, it is possible to continue the activity within the knowledge of the senior management, but it is mandatory to prepare and implement an emergency measure plan for this purpose. (Significant environmental aspect) |
| <b>HIGH RISK BETWEEN 15 AND 20</b>    | The environmental aspect that poses the risk should be monitored. The efficiency of the existing control methods should be reviewed and, if necessary, additional control processes should be established. Environmental programs should be prepared or monitoring should be done to ensure compliance with the previous environmental programs.  |
| <b>MODERATE RISK BETWEEN 8 AND 12</b> | The environmental aspects should be monitored appropriately. Where possible, an environmental program should be created for these impacts. If the existing control methods are required to be reviewed, additional control processes should be established.   |
| <b>LOW RISK BETWEEN 2 AND 6</b>       | An additional control process might not be required to eliminate the impact of the identified environmental aspects.<br>The environmental aspect at this risk level should be monitored as much as possible.  |
| <b>1 NON-SIGNIFICANT RISK</b>         | It is an environmentally non-significant environmental aspect. There is no need to take any additional action.  |

## 7. CRISIS & EMERGENCY MANAGEMENT

### 7.1. Emergency Management Committee

To manage any possible emergencies, an "Emergency Management Committee" will be established within Aydem Holding A.Ş. This committee will consist of:

- CEO,
- CFO,
- HSE&S Group Director,
- Human Resources Group Director,
- Corporate Communications Group Director,
- Risk Management Group Director and
- General Managers of the relevant affiliated group companies of Aydem Holding A.Ş.

This committee is established on case-by-case basis upon the request of the HSE&S Group Director and the approval of the relevant GM and then the CEO in order to manage the emergencies and their consequences that might occur within the scope of HSE&S in accordance with the crisis management procedure to be established by the Risk Management Group Director.

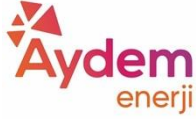
This committee prepares a strategy by taking the primary interests of the general directorate, where the incident has taken place, into consideration. The committee implements all decisions following the approval of the CEO.

### 7.2. Emergency preparedness and response

Crisis and Emergency Management is possible by efficiently reacting when an unplanned incident occurs and organizing the planning and response processes excellently. This process consists of the following steps:

1. Prevention / Minimization; elimination of possible causes of the emergencies.
2. Preparation; preparation for an emergency case

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3. Response; making a planned response to an emergency case
4. Reduction of Damages; process of returning to normal operations
5. Mitigation; preventing the impacts of an emergency case

Aydem Energy Group conducts the following activities for the purpose of preventing and reducing risks related to crises and emergencies, ensuring preparedness for crises and emergencies, protecting the safety of life of its employees, customers and visitors, protecting the environment and preventing any damage to investments and equipment;

Within the framework of preparedness for crisis and emergency;

- It creates clear and understandable commands and control mechanisms and standard operating and application rules for use in crisis and emergency cases.
- It defines the disaster and emergency tasks and responsibilities of all stakeholders as individuals and corporations.
- It continuously increases the level of preparedness for crisis and emergency cases through trainings and drills.
- It makes the necessary measurements and assessments to ensure protection against the negative impacts of emergency cases.

In case of crisis and emergency, it conducts all necessary activities to:

- Make quick, suitable and efficient response,
- Ensure that critical services are continued without any interruptions,
- Use the resources in the best and most efficient way,
- Ensure capacity increase in case of necessity.

Aydem Energy Group creates its "Emergency Plans" for all workplaces starting from the design or establishment phase in order to identify crisis and emergency cases, take the measures to prevent and limit their negative impacts, determine the individuals to be assigned and establish emergency response and evacuation methods. The applicability of the plan is tested with drills held at least once per year. A different scenario is used during the drills every year. The purpose of emergency drills is to implement all possible scenarios related to the incident or emergency, to find the most efficient way to protect the people, workplaces and the environment and to ensure that emergency team personnel have the suitable tools, equipment and arrangements to complete the response operations.

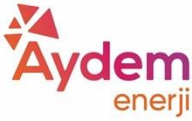
Crisis and emergency cases that might occur in the workplace are determined with risk assessment. Necessary measures are taken to prevent the damages that might be caused by the identified possible and probable emergency cases and to limit their greater impacts. The measures to be taken will comply with the principles of risk protection and will be based upon collective protection.

In case of occurrence of emergency cases; emergency response methods such as giving a warning, search, rescue, evacuation, communication, first aid and fire-fighting are determined.

When establishing the emergency response and evacuation methods, the people other than employees, who are likely to be present in the workplace, such as customers and visitors are taken into consideration. Negative impacts from nearby workplaces and from the environment must be considered.

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To respond to and combat emergency cases, the following teams are formed among the employees in the numbers prescribed in the "Regulation on Emergency Cases in Workplaces":

- Fire-Fighting Team,
- Rescue Team,
- Protection Team and
- First Aid Team.

All employees, including subcontractors and interns, are informed about the emergency team members and emergency plan applicable at the workplace.

A crisis desk is established for crisis management in all affiliated group companies of Aydem Holding A.Ş. The crisis desk should consist of the crisis desk chairman, crisis desk vice chairman, crisis desk members and emergency team managers.

## 8. INCIDENT AND ACCIDENT MANAGEMENT

An accident, incident, hazardous incident, near miss or work-related disease must be reported for the following reasons:

- Aydem Energy Group has a moral responsibility to take care of and protect its employees.
- Aydem Energy Group has a legal responsibility to ensure that all reasonably-practicable steps are taken to ensure the health and safety of its employees, subcontractors and visitors.
- Aydem Energy Group has a legal and moral responsibility to protect the environment, where it operates, and to prevent it from being damaged.

Even though accidents and incidents are unacceptable, they present learning opportunities and therefore, identifying their direct causes and underlying/root causes provide tools to implement sustainable preventive measures.

### 8.1. Accident Classes

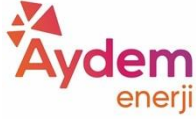
Accidents are divided into four groups as environmental accidents, injuries, accidents resulting in financial damages and social accidents. These accident groups are divided into three classes as A, B and C according to the severity of the impact that they create. Accident groups are defined by accident classes as follows:

#### Environmental Accidents

- Class A: Creates a limited impact (does not affect the habitat, has an impact only on the working area)
- Class B: Affects the habitat in a limited way, but the damage that has caused can be restored
- Class C: Causes irreversible damages to the habitat

#### Injuries

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- Class A: Does not cause permanent damage but results in first aid or simple medical intervention
- Class B: Requires secondary medical intervention/operation and/or results in a lost-time accident.
- Class C: Results in singular or multiple severe injuries or death

### Accidents Resulting in Financial Damages

- Class A: Accidents that do not cause stop of the work, with a maximum cost of 20 thousand USD
- Class B: Accidents that cause limited stop of the work, with a maximum cost of up to 100 thousand USD
- Class C: Accidents that cause stop of the work for a long time, with a cost in excess of 100 thousand USD

### Social Accidents

- Class A: Accidents that cause moderate level of disturbance in the social environment, where we operate, and not covered by the press
- Class B: Accidents that have negatively affected the lives of a part of the social environment, where we operate, and covered by the local press.
- Class C: Events that have negatively affected the lives of most of and/or entire society in the geography, where we operate, and covered by the national press.

### **8.2. Near Miss**

An unsafe action/event that has the potential to cause an accident or incident is referred to as a near miss.

Reporting, recording and reviewing the near-miss incidents in workplaces is important in terms of identifying weak links and problematic parts within the Management System, preventing occurrence of similar situations and avoiding major accidents that might occur.

All reported near misses are recorded and reported by the HSE&S Department, and corrective and remedial actions are ensured to be taken.

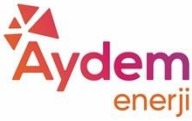
### **8.3. Accident Investigation Team**

The accident investigation team should be established based on the results of the accident and the assessment of possible results.

A team consisting of minimum 5 employees should be created in all group companies to investigate the probable Class B and all Class C accidents. Detailed training should be provided to this team regarding accident and incident investigation and reporting. The created team may be appointed by the CEO to investigate certain Class B and all Class C accidents that occur in our group companies other than their own company.

The purpose of accident investigation is to identify their causes and to establish the corrective and remedial actions that will prevent the re-occurrence of similar accidents. All accidents should be investigated, and accident investigation should be started by assessing the possible results of the accident.

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There are three investigation levels. These are as follows:

**Level A Investigation:**

Level A Investigation can be conducted by the HSE&S Manager/Executive of the relevant company with a team determined in sufficient and necessary number.

**Level B Investigation:**

The team to be determined for the Level B Investigation is appointed by the General Manager and HSE&S Group Director of the relevant company.

The General Manager informs all relevant parties about the names and methodology of the members of the investigation team.

Classification and potential results are required to be approved by the Investigation Team that must include one or all of the following:

- General Manager of the relevant company
- HSE&S Group Director;
- Appointed Investigation Team;
- Business Unit Representative of the Contractor/Union.

The level of potential result underlined in the initial report should be approved by the Investigation Team to verify or modify the required level of investigation.

**Level C Investigation:**

The formation of the team is presented by the HSE&S Group Director to the CEO for approval and it is appointed by the CEO.

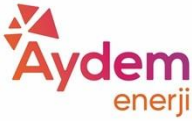
The HSE&S Group Director informs all relevant parties about the names and methodology of the members of the Investigation Team.

Classification and potential results are required to be approved by the Investigation Team that must include one or all of the following:

- CEO
- General Manager of the relevant company,
- HSE&S Group Director
- Appointed Investigation team;
- Business Unit Representative of the Contractor/Union.

Travel planning for the teams with Investigation Level B and C depends upon the severity of the incidents, the geographical area affected by the activities, and the Human Resources department to which the relevant operation is affiliated.

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#### 8.4. Reporting of Accidents and Incidents

All employees, upon their own initiative or through their managers, must report to the HSE&S Department all HSE&S accidents that occur during the working hours as well as all conditions that might result in an accident that could cause a personal injury or death, and near misses.

When severe accidents (death or injury of multiple individuals) occur, the HSE&S Operations Manager must report the accident to the General Manager, HSE&S Group Director, Corporate Communications Directorate and Human Resources Directorate as quickly as possible. (For example, by phone or e-mail).

For all accident classes, the "Accident and Incident Pre-Reporting Form" must be prepared within maximum 24 hours and submitted to the HSE&S Group Directorate.

As all work accidents must be reported to the Social Security Institution within 3 business days in accordance with the legislation, the Human Resources Department is also informed about the accident details.

#### 8.5. Investigation - Root Cause Analysis of Incidents and Accidents

The findings of the incidents, particularly those that cause or may cause major losses, are reviewed to identify the initial causes and underlying/root (system) causes of the incident. Identifying the causes of an incident may reveal or lead to underlying management system failures that might have contributed to the incident.

Root cause analysis:

- is a process for analyzing incidents and identifying critical factors,
- is a tool to ensure consistent and repeatable results,
- is a tool to provide objective results,
- is a tool that should allow for the identification of suitable corrective measures, which if implemented, will prevent occurrence of similar incidents in the future.

Root cause analysis report is prepared by the HSE&S department and submitted to the HSE&S Director.

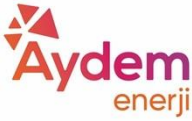
### 9. MEDICAL ACTIVITIES

#### 9.1. Employment & Periodic Medical Examinations

Medical examinations are conducted by workplace physicians against the health and safety risks that the employees of Aydem Energy Group might be or are exposed. Medical examinations of the employees are conducted in the following cases:

- At the time of employment.
- In case of a job change.
- In case of returning to work after repeated absences from work due to a work accident, occupational disease or health reasons.

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- At regular intervals prescribed by legal legislation during the term of employment according to the nature of the employee and the work and the hazard class of the workplace.

The medical examinations required for the groups that require implementation of a special policy, those diagnosed or pre-diagnosed with an occupational disease and the employees with chronic diseases, substance addiction and history of multiple work accidents are conducted by the workplace physician, and a medical report is issued for placing them in suitable positions.

Employees are required to pass through suitable examinations (Hemogram, Fasting Blood Sugar, Biochemistry, Respiratory Function Test (STF), Audiometry (ODIO), Lung X-ray, ECG, etc.) at the time of employment and periodically as prescribed by the legal legislation.

### 9.2. Reporting of Medical Records

A medical report is issued for the employee, whose medical examination has been conducted by the workplace physicians at the time of employment and periodically in accordance with the legal regulations.

As medical data is confidential, medical reports cannot be shared with anyone other than medical officers (workplace physician, other medical personnel, etc.). A "Medical Opinion Form" is prepared in relation with the opinion and conclusion regarding the medical condition the employee, and it is shared with the Human Resources Department to keep it in the personal file of the employee.

Any interventions made to the employee by medical officers at the workplace/infirmary and disease reports are recorded for the purpose of investigating occupational medical aspects and also for incident reporting. All injuries and work-related diseases are immediately reported to the HSE&S Department.

The statistics of medical records are classified according to the medical problems without sharing the patient names, and reported to the HSE&S Department on a monthly basis.

### 9.3. Management of Infectious Diseases

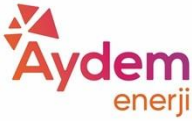
Medical officers (workplace physician, other medical personnel, etc.) ensure that necessary hygiene trainings are provided and necessary examinations and analyzes are conducted in addition to the works aimed at immunization and prevention of contamination for the containment of infectious diseases, in connection with the risk of infectious diseases that the employees of Aydem Energy Group might be or are exposed to.

Detailed explanations are provided regarding the procedures and guidelines and the methods for protection against infectious diseases and the steps required to be taken in case of suspicion of infectious diseases. Infectious diseases and epidemics are assessed as risks within the scope of emergency plans, and preventive and limiting measures are determined.

To prevent the spread of the infectious disease, the individuals who are sick and who come into contact with the relevant patient are taken into quarantine and not allowed to come to the workplace. Priority is given to the works conducted to protect employees in special risk groups against infectious diseases.

In addition to the hygiene trainings of the employees who come into contact with food, periodic medical checks are important in terms of detecting infectious diseases.

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By taking the relationship between infectious diseases and epidemics and environmental health into consideration; necessary cooperation is ensured with the local medical unit, all relevant public institutions and organizations and natural persons and legal entities.

## 10. TRAININGS

Aydem Energy Group provides training to its employees at regular intervals to ensure that each activity, product, operation and service procedure conducted in the offices of the Company and in the field operates smoothly. The scope, duration and frequency of repeat of these trainings vary depending upon the type and subject of the training.

### 10.1. On-the-job Trainings

This is the practical training provided to the employees before they actually start working, in relation with the matters such as occupational health and safety measures specific to the job that the employee will perform, working equipment to be used by him/her, if any, and the workplace, and is subject to the provisions of the *Regulation on the Procedures and Principles for Occupational Health and Safety Training of Employees* as published in the Official Journal dated 15 May 2013 and numbered 28648. Each new employee is provided on-the-job orientation training regarding occupational health and safety. The scope or duration of this orientation training may vary depending upon whether the employee works in the field or in the office and his/her job description.

Orientation trainings should be qualified to ensure that the employees are protected against hazards and risks until the fundamental trainings are provided and should be given practically. Orientation training is organized for at least two hours for each employee. The duration spent in these trainings is not counted as the duration of fundamental trainings.

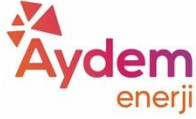
### 10.2. Toolbox Trainings

Toolbox trainings provided by Aydem Energy Group within the scope of HSE&S mainly cover the matters related to occupational health and safety.

During the Toolbox trainings, employees are provided with a short training of approximately 15 minutes regarding a topic selected at the beginning of each week. Although the topic of these trainings depends upon the department where the training is provided, they can be also provided on the following topics:

- Eye and Face Protection
- Use of Mobile Phone at Work
- Lifting Operations
- Fall Protection Systems
- Actions required to be taken before, during and after an earthquake
- Use of Personal Protective Equipment
- General First Aid Information
- Working Around Lifting and Moving Equipment
- Actions required to be taken in Case of Fire

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## HSE and Sustainability Handbook

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- Working Safely Around Heavy Construction Equipment
- General HSE Rules
- Emergency escape plan
- Ergonomics etc.

These trainings can be explained for several times in different sessions by the trainer for reminder purposes in case of necessity. At the end of the training, a training participation form is completed to indicate the subject of the training, trainers, participants and the date of the training.

### 10.3. Legal Legislation Trainings

According to the Annex-1 of the Regulation on the Procedures and Principles of Occupational Health and Safety Training of Employees as published in the Official Journal *dated 15.05.2013 and numbered 28648*, the topics of the occupational health and safety training to be provided to the employees are listed below.

#### 1. General topics

- a) Information about the labor legislation,
- b) Legal rights and responsibilities of the employees,
- c) Cleanliness and order of the workplace,
- d) Legal consequences arising from work accidents and occupational diseases.

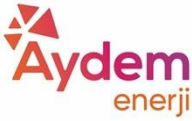
#### 2. Medical topics

- a) Reason for occupational diseases,
- b) Application of disease protection principles and protection techniques,
- c) Biological and psychosocial risk factors,
- d) First aid,
- e) Harms of tobacco products and passive smoking.

#### 3. Technical topics

- a) Chemical, physical and ergonomic risk factors,
- b) Manual lifting and handling,
- c) Flare, explosion, fire and fire protection,
- d) Safe use of working equipment,
- e) Working with vehicles/tools equipped by a screen,
- f) Electricity, its dangers, risks and measures,
- g) Reasons for work accidents and application of protection principles and techniques,
- h) Safety and health signs,
- i) Use of personal protective equipment,
- j) General rules for occupational health and safety and safety culture,
- k) Evacuation and rescue.

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**4. Other topics** (Working at height specific to the job of the employee, working in an enclosed area, working in environments with radiation risk, working with welder, working with equipment that bears special risks, possible medical risks caused by carcinogenic substances etc.)

These fundamental trainings to be provided to the employees are organized for each employee at regular intervals during the term of employment as follows:

- At least eight hours for less hazardous workplaces,
- At least twelve hours for hazardous workplaces,
- At least sixteen hours for very hazardous workplaces.

#### **10.4. Repeating the Trainings**

The scope, contents and obligations of these trainings can be regulated by the authorized officers of the HSE&S Department and trainers. Also, the changes in legal legislation, changes in the activities conducted within the Company and the services provided and the recovery/accident statistics related to the topic of training after the training are the factors that change the frequency of repeating the trainings.

The frequency of repeating the training for the employee is adjusted at the following regular intervals by taking the above-mentioned factors into consideration and the changing and emerging new risks:

- a) At least once per year in the workplaces classified as very hazardous.
- b) At least once every two years in the workplaces classified as hazardous.
- c) At least once every three years in the workplaces classified as less hazardous.

An employee, who had a work accident or an occupational disease, is provided additional training regarding the reasons for the accident or occupational disease, methods of protection and safe working methods before returning to the workplace.

Those employees, who have been away from work for more than six months for any reason, are provided refresher training before resuming to work.

#### **10.5. Training Records**

For each training, a form that contains the information of the trainer providing the training, the topic of the training, the date of the training and the information of the participants of the training is signed by the trainer and the participants. The training forms, presentations and documents are kept.

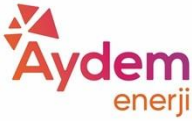
### **11. CONTRACTOR MANAGEMENT**

#### **11.1. HSE&S Management of Contractors**

For service procurements to be made in all workplaces of Aydem Energy Group, the candidate companies are informed about HSE&S Management. The HSE&S Department is included into the procurement and contract processes.

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The requirements of the Health, Safety and Environmental legal legislation as well as the responsibilities and obligations of the contractor are described in the content/appendix of the contracts to be made with the contractor. Opinion and approval are obtained from the Legal Department for the contract and its appendixes.

It is essential to determine in advance the risky activities related to the works of the contractor. The Contractor is informed about all procedures and guidelines of Aydem Energy Group regarding HSE, and is inspected in terms of compliance.

It is confirmed before the work begins that the contractor will employ qualified, competent and trained personnel regarding the activities to be conducted. If the competencies and qualifications of the contractor's personnel are approved by the HSE&S Department, the execution of the work begins.

It is inspected that all equipment, plants, machines and devices taken into or used in activity areas by the Contractor do not pose a risk in terms of occupational health and safety and the environment and that they fulfill the national legal legislation requirements and standards.

Before starting the risky activities to be conducted by the contractor, working permits are obtained and if approved, the contractor can begin to operate.

### 11.2. Coordination of Contractors

Efficient communication increases awareness about HSE&S and it is important for the successful implementation of the HSE&S Management System. Communication can take place in many ways, but the common targets are always clear understanding of occupational health and safety-environmental requirements and the creation and improvement of a life safety culture.

Regular meetings are planned and held by the HSE&S Department to ensure communication and coordination between contractor companies. The agenda items and decisions taken in the meeting are recorded. In these meetings, decisions are taken regarding the measures to be taken to ensure that the contractors fulfill all requirements regarding health, safety and environment and eliminate the deficiencies and non-conformities.

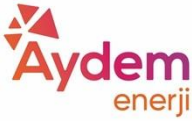
## 12. PROCUREMENT MANAGEMENT

### 12.1. Establishment of Procurement Processes

Procurement processes for purchasing products and services by Aydem Energy Group are established in accordance with the HSE&S policy and legal legislation. The opinions and suggestions of the HSE&S Department are taken into consideration in the selection of raw materials, equipment, supplies and companies to be procured by the Purchasing Department.

Equipment and materials that will negatively affect occupational health and safety and the environment during the use are not preferred. CE certificates, quality certificates and information about the use of the equipment, materials and hardware to be purchased are obtained from the supplier company.

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For the procurement of chemicals, Material Safety Data Sheets (MSDS) that describe the hazards of the chemical, use, storage, transportation and emergency procedures are obtained and shared with the HSE&S Department.

When selecting a service company, it is important that such company fulfills/will fulfill all laws and requirements regarding HSE. Companies must operate in accordance with the working conditions and applicable legislation.

### 12.2. Personal Protective Equipment Standard

In the cases where the prevention or sufficient reduction of risks in the workplace cannot be achieved by collective protection based on technical measures or work organization or working methods; personal protective equipment with all legal requirements described is used.

Personal protective equipment to be procured by the purchasing departments must have a declaration of conformity with European Norms, and comply with national and international standards. Before procuring the personal protective equipment, the opinion and approval of the HSE&S Department is obtained. When selecting the PPE, the climatic conditions, working conditions and activities conducted are taken into consideration.

Necessary and sufficient number of personal protective equipment (PPE) is provided for all employees and visitors, who may be exposed to risks and hazards in the working area, and sufficient number of spare PPE is kept in the stocks.

## 13. MEETINGS

### 13.1. Weekly Meetings

The HSE&S Group Directorate and HSE&S Department managers of Aydem Energy Group hold a weekly meeting. The activities conducted by the Group Companies within the week, the plans made for the next week and the decisions taken by the management constitute the agenda items of such meeting.

The meetings are held electronically. The meetings are chaired by the HSE&S Group Director.


### 13.2. Contractor Meetings

The HSE&S department managers of Aydem Energy Group hold monthly meetings with the authorized officers of the contractor companies from which they receive services. In these meetings, decisions are taken regarding the measures to be taken to ensure that the contractors fulfill all HSE-related requirements and eliminate deficiencies and non-conformities. The authorized officers of the Contractor Company are informed about the new decisions taken by the Management.

### 13.3. Committee Meetings

The HSE&S department managers of Aydem Energy Group hold Occupational Health and Safety Committee meetings with the participation of committee members at specified periods according to the requirements of the legal legislation. Decisions taken at the committee meeting are recorded in the minutes.

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The date and time of the committee meetings to be held are notified in advance to the HSE&S Group Director and the Group Manager. The HSE&S Group Director and/or Group Manager may participate in the committee meetings if they are available to participate.

Critical decisions taken at the OHS Committee meetings are reported to the HSE&S Group Directorate.

## 14. COMMUNICATIONS

Aydem Energy Group establishes, implements and maintains the processes required for internal and external communications regarding the HSE&S Management System. When establishing the communication processes, it takes compliance obligations into consideration and ensures the reliability and conformity of the HSE&S information provided with the information created within the HSE&S Management System

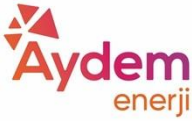
### 14.1. Internal Communications

The purpose of internal communications, consultation and participation channels is to encourage the exchange of ideas and information to continuously improve the HSE&S performance and the HSE&S Management System across Aydem Energy Group.

Internal communications processes should result in:

1. It should be ensured that employees and subcontractors are aware of the following:
  - Health, Safety, Environment and Sustainability Policy of Aydem Holding A.Ş.
  - Quality management system
  - Legal and other requirements
  - HSE&S procedures
  - HSE&S performance, purposes and targets
  - Other information regarding hazards and risks of work activities
2. Participation of employees and/or the subcontractor should be ensured in the following cases:
  - Identifying the hazards, assessing the risks and determining the controls
  - Investigating the accidents
  - Developing and reviewing the Health, Safety, Environment and Sustainability Policy, Quality Policy and HSE&S Targets of Aydem Holding A.Ş.
3. Consulting the employees and/or the subcontractor when there is a change such as new and changed materials, equipment, chemicals, technologies, processes, work methods, etc. related to occupational health and safety

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## 14.2. External Communications

The purpose of external communications, consultation and participation channels is to facilitate the exchange of information regarding the HSE&S Management System with stakeholders, including regulators and the society, in accordance with the Health, Safety, Environment and Sustainability Policy of Aydem Holding A.Ş. and the HSE&S Management System requirements.

External communications, consultation and participation processes should result in:

1. Establishing a process to obtain and maintain the records of external requests for information regarding the HSE&S Management System.
2. Defining the responsibilities for reviewing and responding to external requests regarding the HSE&S Management System
3. Defining the type of information about the HSE&S Management System that will be disclosed to the public
4. Defining the lines of communications between Aydem Holding A.Ş. and regulatory authorities regarding the development of new HSE&S regulations, amendment of the existing HSE&S regulations and providing reports about the HSE&S Management System.

The personnel of Aydem Energy Group are not authorized to provide information about the HSE&S Management System directly to external parties without review and approval by the HSE&S Group Director.

## 15. PERFORMANCE ASSESSMENT

### 15.1. Monitoring, Measurement, Analysis and Performance Assessment

The HSE&S Department of Aydem Holding A.Ş. monitors, measures, analyzes and assesses the HSE&S performance announced based on the determined annual targets.

Aydem Energy Group uses both proactive (daily site inspections, periodic occupational safety tours, internal audits and management review meetings, etc.) and reactive tools (HSE&S statistics, accident/incident investigations, etc.) to assess such performance.

Aydem Energy Group ensures the use and maintenance of the calibrated or verified monitoring and measuring equipment.

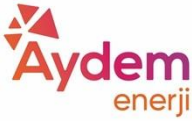
Aydem Energy Group reports the relevant HSE&S performance to the HSE&S Department of Aydem Holding A.Ş. both internally and externally during the communications process as required by the compliance obligations.

Aydem Energy Group establishes, implements and maintains the processes required to assess the fulfillment of the communicated compliance obligations. Aydem Energy Group keeps the relevant records as evidence of the compliance assessment results.

### 15.2. Internal audit

Aydem Energy Group conducts internal audits at planned intervals to understand whether the HSE&S Management System complies with its own management system and the requirements of the ISO 45001:2018 and ISO 14001:2015 and to understand whether the HSE&S Management System is efficiently implemented and maintained.

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Aydem Energy Group establishes, implements and maintains internal audit programs by taking into consideration the importance of the relevant processes, the changes that affect Aydem Energy Group and the results of the previous audits. Aydem Energy Group keeps the internal audit documentation as evidence of the implementation of the audit program and the audit results.

### 15.3. Management Review

Senior Management of Aydem Energy Group reviews the HSE&S Management System at planned intervals to ensure ongoing conformity, sufficiency and efficiency. Inputs, outputs and results of the Management Review (MR) Meetings are recorded by Aydem Energy Group.

### 15.4. Reports

All reports and records used for performance assessment are properly kept by the HSE&S Department.

## 16. IMPROVEMENT

### 16.1. Corrective and Remedial Action

Necessary works are conducted to eliminate actual or potential non-conformities identified in quality, health, safety and environmental processes, to continuously improve them and to determine the activities that will prevent re-occurrence of them.

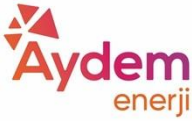
Identification of the non-conformity can be done in the following ways:

- Internal Audit Reports
- Suggestions and Demands of Employees
- Customer Complaints
- Employee Assessment Results
- Data Analysis Studies
- Quality System Applications
- Near Miss Incidents

When dealing with the corrective and remedial actions, the following steps are followed:

- Determination of the actual or potential non-conformity
- Determination of the cause(s) for actual or potential non-conformity
- Determination of the urgent measure(s) to be taken, date and action owner (responsible parties)
- Determination of the permanent action(s) that will prevent the re-occurrence of actual non-conformity or potential non-conformity.
- Determination of the date of the permanent action(s) to be taken, the party that will take the action (responsible parties) and recording the date of the action taken

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- Review of the efficiency of the corrective and remedial action(s).

If necessary:

- Updating the risks and opportunities identified during the planning
- It is essential to identify the permanent actions that eliminate the root causes of actual or potential non-conformities. Actions should be suitable in terms of the severity of the problems and should be in proportion to the HSE&S risks encountered.
- Risk assessments can be also used to determine the preventive actions before starting a new job. The riskiest steps of the job are determined by the relevant managers and engineers, and preventive actions are taken accordingly.

### 16.2. Continuous Improvement

Aydem Energy Group continuously improves the efficiency, suitability and sufficiency of its HSE&S Management System to enhance the HSE&S performance. For continuous improvement, it follows up:

- New technologies,
- Internal and external positive practices,
- Suggestions or recommendations from relevant parties,
- New knowledge and understanding regarding the HSE-related matters,
- New or improved materials,
- Changes in the skills and competencies of the employees.

## 17. SUSTAINABILITY


We, as Aydem Energy Group, adopt a sustainable business approach that is compatible with global targets together with all our employees, business partners and stakeholders in the sector where we operate, and we believe that the development in the economic field should be achieved in a way that covers all elements of the planet as well as the entire humanity.

We continue all our activities for the purposes of protecting human health and safety, supporting human development and providing equal opportunities. We are focused on the establishment of innovative, reliable and accessible working and living environments that ensure sustainability of human development.

We aim to create a modern working environment that respects human rights, ensures social justice and continuously improves labor rights, and to raise the awareness of the employees, customers and all other stakeholders about sustainability by spreading this approach.

We adopt execution of all our activities in an environmentally-friendly way as a fundamental value, and we develop the ways to eliminate all possible negative factors caused by our environmental aspects by identifying these factors in advance.

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As the leading energy company in Turkey, we are focused on renewable energy while working for the sustainable future of our country, and we generate energy from hydroelectric, wind and geothermal sources. We leave our mark on the future through many breakthroughs, and we change the rules in the energy sector.

#### 18. REFERENCES

- ISO 14001:2015 Environmental Management Systems Standard
- ISO 45001:2018 Occupational Health and Safety Management Systems Standard
- Occupational Health and Safety Law No. 6331
- Regulation on Emergency Cases in Workplaces
- Regulation on the Procedures and Principles of Occupational Health and Safety Training of Employees
- Disciplinary Actions Procedure (AE.IK.PRS.009)

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