



ANADOLU GROUP

## **AG ANADOLU GRUBU HOLDİNG A.Ş. ENVIRONMENTAL MANAGEMENT SYSTEM FRAMEWORK**

### **1. Purpose and Scope**

This document aims to establish a framework of the environmental management system and to communicate with the stakeholders regarding the compliance of AG Anadolu Grubu Holding A.Ş. (“Anadolu Group”) with environmental laws, regulations and obligations, and the elements and processes related to the determination, monitoring, control and review of environmental policy objectives and targets.

### **2. Environmental Policy**

The Environmental Policy document details our policy, which places the protection of nature and environment among our most vital and fundamental tasks.

### **3. Environmental Impact**

Environmental impacts are determined on unit, area, activity and equipment basis. Risks have been assessed based on legal requirements; impact value; impact on environment; duration and severity; and frequency, materiality and resources of occurrence (air pollution/greenhouse gas emissions, soil pollution, water pollution, noise pollution, resource usage). Assessment elements and results are included in the Environmental Impact Assessment List.

Environmental impacts are also handled in the related application document.

### **4. Legal and Other Terms**

In regards to their activities, Anadolu Group and its companies stringently monitor and ensure compliance with the relevant scope of environmental laws and regulations.

### **5. Goals and Objectives**

The Occupational Health and Safety – Environmental Goals and Objectives document is prepared by the Employer Representative, Environmental Management Representatives, On-Site Doctor, Energy Manager, and Occupational Safety Specialist based on the Environmental Aspects Assessment List and Environmental Policy. The Sustainability



Committee reviews and approves the document. All departments, managers and employees monitor, review and include the audit scope of environmental goals and targets through the approved document.

## **6. Training**

The Sustainability Committee determines the training requirements of the Environmental Management System by considering relevant regulations. The Human Resources department carries out training activities on environmental awareness and risks, and Environmental Management System elements.

## **7. Communication**

A working group consisting of the Sustainability Committee Chairman, the Chief Financial Officer, and the Corporate Affairs and Communications Coordinator handles and finalizes the Environmental Policy, environmental commitments, goals and targets, outcome performance, environmental activities and shares the information with stakeholders in accordance with the Anadolu Group Disclosure Policy. Emergency communication plan is also determined in the same process.

## **8. Documentation and Document Control**

All elements and processes of the Environmental Management System are recorded as specified in the relevant regulations. Documents are reviewed and updated at least once a year. However, they may also be reviewed and updated immediately, if required.

## **9. Operation Management**

The Sustainability Committee determines the Environmental Policy as a significant environmental impact and ensures that the control procedures pertaining to processes and activities featuring the committee's environmental objectives and targets are prepared and updated.

Environmental Management Representatives or those responsible monitor compliance with the specified processes, record the situation, determine the incompatibilities, and take the necessary actions.



## **10. Monitoring Environmental Performance**

Environmental Management Representatives or those responsible carry out the necessary monitoring and measuring tasks and handle the verification and calibration procedures of the necessary monitoring and measuring tools, and record the results. Environmental performance results are reported to the Sustainability Committee at least once a year. The Sustainability Committee notifies Anadolu Group Board of Directors at least once a year.

## **11. Corrective and Preventive Actions**

Environmental Management Representatives and those responsible establish a Corrective and Preventive Actions Procedure to identify, correct and prevent the incompatibilities. The procedure is implemented following the approval of the Sustainability Committee.

Incompatibilities are recorded by the Environmental Management Representatives or those people. Vital and/or urgent matters are discussed and assessed at Management Review meetings and submitted to the Sustainability Committee.

## **12. Protection, Duration and Disposal of Records**

Information and documents featuring the Environmental Policy and the Environmental Management System are kept throughout the period designated by the Legal Affairs Directorate in accordance with the general and special provisions in the laws and relevant regulations. Records which have completed their effective duration or have expired are duly destroyed or recycled.

## **13. Internal Audit and Management Review**

Anadolu Group executives and employees are responsible for ensuring business and environmental sustainability by reporting incompatible events and processes in the Environmental Management System (environment, health, occupational safety, maintenance, repair, calibration, measurement, etc.).

Companies that provide services for the Environmental Management System also report incompatible incidents and processes, and the actions taken are monitored.

Anadolu Group internal review team reports to the Anadolu Group Human Resources Presidency. The team annually audits compliance with the Environmental Management



System and relevant procedures as part of the internal audit processes and reports the audit results to the Sustainability Committee.

The Sustainability Committee reviews the reports of the Environmental Management representatives, the other employees those responsible and the internal review team then evaluate Anadolu Group's environmental performance and assess its environmental policy and environmental management system. A report is presented to the Board of Directors concerning their environmental performance and review.

Anadolu Group Top Management reviews the Environmental Management System at least once a year, based on the reports prepared by the Sustainability Committee and the internal review team, to ensure compliance, adequacy and effectiveness and submits the review results to the Board of Directors.