



Cengiz Holding A.Ş.

Environmental Policy

Revision No. : 01
Revision Date : 15.09.2025

Table of Contents

1.	Purpose and Scope	3
2.	Definitions	3
3.	General Principles	4
4.	Implementation Principles	4
5.	Our Commitments.....	5
6.	Training & Development	6
7.	Roles and Responsibilities	6
8.	Revision History	6

1. Purpose and Scope

Cengiz Holding Inc. and its Group Companies (“Cengiz Holding”, “Holding” or “Group”) have prepared this Environmental Policy (“Policy”) in line with the vision of being “Both a Leader and a Pioneer,” with the aim of protecting nature and standardising a sustainable environmental management system across all Group companies.

This Environmental Policy has been prepared in compliance with applicable national legislation as well as international best practices, particularly the IFC Performance Standards (PS1: Assessment and Management of Environmental and Social Risks and Impacts, PS3: Resource Efficiency and Pollution Prevention).

This Policy covers all activities and subsidiaries of the Holding and applies to employees, contractors, suppliers, and all business partners. As Cengiz Holding, we expect all our stakeholders to comply with the provisions of this Policy and we undertake to take the necessary measures to ensure such compliance.

2. Definitions

Unless otherwise defined under this section, the terms, words, and expressions used in this Policy shall take their meaning from applicable legislation and sectoral usage.

Aichi Biodiversity Targets¹: An agreement consisting of 20 targets under 5 main goals aimed at the conservation of biodiversity.

European Green Deal²: A set of policy initiatives led by the European Commission with the objective of making Europe climate neutral by 2050.

UN: Abbreviation for the United Nations international organisation.

UN Global Compact³: A UN pact consisting of ten fundamental principles that set out improvement goals in the areas of human rights, labour standards, anti-corruption, environment, and workers’ rights.

UN Sustainable Development Goals⁴ (SDGs): A call to action adopted by UN member states to address global challenges such as climate change, hunger, and poverty.

Environment: The entire ecosystem encompassing all living and non-living entities on Earth, including air, water, soil, and vegetation.

Carbon Footprint: A measure of the environmental impact of human activities in terms of the amount of greenhouse gases produced, expressed in units of carbon dioxide. The carbon footprint consists of two main parts: direct/primary footprint and indirect/secondary footprint.

¹ <https://www.cbd.int/sp/targets/>

² https://ec.europa.eu/info/sites/default/files/european-green-deal-communication_en.pdf

³ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

⁴ <https://sdgs.un.org/goals>

⁴ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

⁴ <https://sdgs.un.org/goals>

Primary footprint: The measurement of direct CO₂ emissions from the burning of fossil fuels, including domestic energy consumption and transportation.

Secondary footprint: The measurement of indirect CO₂ emissions related to the entire lifecycle of products we use, from their manufacture to their disposal.

Our stakeholders: Includes suppliers, distributors, authorised service providers, any representatives acting on behalf of the company, subcontractors, and consultants.

Water Footprint: An indicator of freshwater use. It covers not only the water consumed directly as a producer or consumer but also the indirect water consumption. The water footprint has three components: green and blue (representing water consumption) and grey (representing water pollution).

German Supply Chain Due Diligence Act: A German law that entered into force on 22.07.2021 with the aim of ensuring the sustainable monitoring of supply chains and supporting the protection of nature. Under this law, companies are obliged to uphold human rights and environmental standards during their operations.

3. General Principles

As Cengiz Holding, we apply standards that minimise potential adverse impacts on nature by assessing our relationship with the environment throughout all our production, supply, and delivery processes, as well as across our operations in the construction, energy, mining, services, tourism, aviation, and insurance sectors.

Our primary principle is to act in compliance with the Aichi Biodiversity Targets, the European Green Deal, the UN Sustainable Development Goals, the ten principles of the UN Global Compact, the German Supply Chain Due Diligence Act, and similar local and international standards

4. Implementation Principles

Identification of Risks

As Cengiz Holding, we plan and conduct our activities in compliance with the relevant legislation, laws, and regulations. In this context, we carry out risk assessments to identify all factors in our business areas that may cause harm to the environment. As part of our operations, we continue our efforts to minimise our carbon and water footprint, establish a waste management action plan, and contribute to the protection of biodiversity. These activities are carried out across all our locations, including worksites and offices.

Our relevant teams convene at least once a year to assess current environmental impacts in the workplace, identify, and evaluate potentially risky processes arising from Group activities. The identified risks are documented for monitoring purposes.

The identified risks are updated in cases such as the following, or when other needs arise:

- Amendments to legal regulations,
- Occurrence of an emergency event causing adverse environmental impact,
- Changes in the technology, substances, or equipment used in the workplace,
- Modifications in production, manufacturing, supply, or waste disposal processes,

- Force majeure events such as natural disasters originating outside the workplace,
- Failure to achieve sustainability targets,
- Increase in measured air and water pollution levels around our facilities,
- Increase in the potential impact of our activities on energy, water, soil, air, biodiversity, noise, vibration, and natural resources,
- Outcomes of assessments conducted as part of periodic review schedules.

Establishment of Action Plans

To minimise the impact and likelihood of potential risks, identified risks are communicated to process owners. Based on their assessments, risks are prioritised according to their impact level, and an action plan is prepared for each.

When creating action plans, the following considerations are taken into account:

- Ensuring recovery of waste at its source, and if recycling is not possible, disposing of it in a way that causes minimal harm to the environment,
- Ensuring the use of environmentally friendly and sustainable products and services,
- Ensuring efficient and effective use of energy resources in operations,
- Developing environmentally friendly solutions in the supply chain to reduce our carbon and water footprint,
- Conducting surveys to gather valuable feedback from all our employees and stakeholders to reduce our negative environmental impact, and integrating this feedback into our improvement processes.

5. Our Commitments

As Cengiz Holding, we shape our occupational health, safety, and environmental policy objectives within the framework of “taking the necessary measures for the protection of the environment and human health, and ensuring continuous improvement in environmental and health/safety systems.” To achieve these objectives, we commit to the following:

- Always identifying in advance the factors that may pose a threat to the environment and human health and taking the necessary precautions,
- Using natural and energy resources efficiently and effectively,
- Minimising the adverse impacts of our activities on people and the environment,
- Raising awareness among all our stakeholders, including our employees, customers, and suppliers, on the protection of health and the environment, and ensuring training is provided where necessary,
- Complying with local and international environmental and occupational safety legislation, relevant international best practices, standards, and the requirements of organisations of which we are a member,
- Implementing continuous improvement to prevent recurrence of accidents and incidents,
- Developing regular social responsibility projects each year to protect nature and support the European Green Deal,

- Keeping our Policy continuously up to date and sharing it on public platforms and through internal communication channels.

6. Training & Development

We organise regular training sessions to enhance the awareness and knowledge levels of our employees regarding the potential adverse impacts that may arise if environmental protection measures are not taken. These trainings are planned at least once a year. Training needs are determined by the relevant technical team, while the planning, implementation, and monitoring of the trainings are carried out by the Human Resources Department.

Environmental rules and procedures that must be followed, particularly by employees working on sites, are visibly posted in work areas. Our workplaces are arranged in line with sustainability principles and environmentally friendly practices.

7. Roles and Responsibilities

All employees of Cengiz Holding are obliged to comply with the rules set out in this Policy. Employees who identify a situation that conflicts with the Policy or may cause harm to the environment must promptly report the matter to:

- The Legal Department,
- The Sustainability Department,

The joint responsibility of the Legal and Sustainability Departments is to communicate the requirements of this Policy to employees, ensure compliance by employees, and establish an effective internal control environment accordingly.

In the countries where Cengiz Holding operates, if the applicable legal regulations are more restrictive than the provisions of this Policy, the relevant legal regulations shall take precedence.

Failure to comply with the Policy may result in various disciplinary sanctions, including termination of employment.

8. Revision History

This Policy has been approved and enacted by the relevant Resolution of the Company's Board of Directors, and the joint responsibility of the Sustainability and Legal Departments is to update it periodically in line with changes in legal regulations and Group processes.

Revision No.	Revision Date	Description
01	15.09.2025	Revised to enhance alignment with applicable legislation, international standards, and company practices.