

SUSTAINABILITY POLICY

1. PURPOSE AND SCOPE

The purpose of this Policy is to establish the approach of KÂR Katılım Altın Rafinerisi A.Ş. ("the Company") to managing economic, environmental, social and governance matters and developing its sustainability-related reporting capabilities.

This Policy aims to integrate sustainability-related risks and opportunities into decision-making processes, manage significant impacts, regularly assess the Company's reporting obligations and ensure that disclosures are based on reliable data.

This Policy applies to sustainability management and reporting activities relating to the Company's operations, products and services, facilities and employees, as well as business relationships within the value chain to the extent of the Company's control or influence.

The reporting entity boundary is determined by taking into account the relevant financial reporting boundary and the applicable reporting framework. The scope and reporting period of any mandatory or voluntary reporting, together with the standards applied, shall be clearly defined.

2. FUNDAMENTAL PRINCIPLES AND OUR COMMITMENTS

The Company adopts and commits to the following principles in its sustainability management and reporting activities:

- To assess annually whether the Company falls within the scope of the Turkish Sustainability Reporting Standards (TSRS), taking into account the applicable decisions of the Public Oversight, Accounting and Auditing Standards Authority, the Company's legal form, threshold criteria, reporting periods and consolidation principles.
- To progressively develop its governance, data collection, internal control and reporting capabilities in preparation for potential future obligations and good practices, including during periods in which the Company is not subject to mandatory reporting requirements.
- To identify sustainability-related risks and opportunities and their potential effects over the short, medium and long term, and to appropriately integrate them into the Company's strategy, business model, financial planning, risk management and investment decisions.
- For reporting under TSRS, to apply the materiality principle to sustainability-related financial information that could reasonably be expected

to influence the decisions of the primary users of general purpose financial reports.

- To separately assess the Company's significant impacts on the environment and society as part of its broader sustainability management activities, without conflating this approach with the financial materiality requirement under TSRS.
- To establish roles, processes, controls and approval mechanisms covering governance, strategy, risk management, and metrics and targets.
- To assess climate-related physical and transition risks and opportunities in accordance with the nature of the Company's activities and the availability of data, and to develop scenario analysis and resilience assessments where necessary.
- To define data owners, definitions, calculation methodologies, source systems, control points, approval levels and retention requirements for sustainability indicators.
- To observe the principles of accuracy, neutrality, comparability, verifiability, timeliness and understandability in public disclosures.
- Not to describe any report or disclosure as "compliant with TSRS" unless all applicable requirements have been met.
- Where an assurance engagement is required under applicable legislation, to plan the process to be conducted by an authorised independent auditor, and to assess the need for voluntary assurance based on risk considerations and stakeholder expectations.
- To develop employees' competence in sustainability, data quality, materiality, climate-related risks and reporting responsibilities through training.
- To support targets and commitments with the Company's existing capabilities and reliable data, and to disclose progress, deviations, changes in methodology and limitations in a balanced manner.

3. DUTIES AND RESPONSIBILITIES

- The Board of Directors approves the Policy and any mandatory or voluntary sustainability reports and provides oversight of sustainability-related risks and opportunities.
- General Management coordinates sustainability activities, determines the relevant responsibilities and resources, and ensures that sustainability matters are integrated into strategy and risk management.
- The function responsible for financial affairs or financial reporting oversees the consistency of sustainability-related financial disclosures with the financial statements and the consolidation boundary.
- The functions responsible for environment, energy, occupational health and safety, human resources, quality, procurement, information technologies,

compliance and other data-owning functions provide the data for which they are responsible in accordance with the defined methodologies and controls.

- The internal control and compliance functions support processes relating to scope assessments, regulatory monitoring, data controls, disclosure approvals and reporting risks.
- Corporate disclosures may only be made by authorised governing bodies and persons. All employees shall comply with data accuracy and confidentiality requirements.

4. MONITORING, RECORD-KEEPING AND FEEDBACK

4.1. Monitoring and Record-Keeping

- The Company's reporting obligations under TSRS, sustainability-related risks and opportunities, level of data readiness, progress against any established targets and significant control findings are periodically reviewed, taking into account the nature of the Company's activities and its level of development.
- Where a statutory reporting obligation arises or the Company decides to make a voluntary public disclosure, the sustainability information to be disclosed shall be subject to a documented review and approval process.
- Material changes in applicable legislation, standards, the Company's structure, the scale of its activities or its risk profile shall be reflected in the Policy and the relevant reporting plan.

4.2. Feedback

Reports involving suspected ethical violations or nonconformities, as well as questions, concerns or feedback regarding this Policy, may be submitted through the following communication channels:

Ethics and Whistleblowing Reports: etik@karaltinrafinerisi.com

Web Form: Ethics and Compliance Violations Reporting Form

Address: Yarımburgaz Mah., 1. Cumhuriyet Cad. No: 50, İç Kapı No: 1,
Küçükçekmece / İstanbul / TÜRKİYE

Reports are assessed in accordance with the principles of confidentiality, impartiality, personal data protection and protection against retaliation. No adverse action against any person who makes a report in good faith shall be permitted.

5. BREACHES AND SANCTIONS

Any conduct contrary to this Policy, the Company's policies and procedures, ethical principles or applicable legislation shall be considered a breach. Taking into account the nature, severity, recurrence and impact of the breach, as well as the status of the

relevant party, necessary administrative, disciplinary, contractual and/or legal actions shall be applied.

For employees, appropriate disciplinary and administrative actions shall be taken within the framework of applicable labour legislation, employment agreements, ethical principles and the relevant internal regulations of the Company. For third parties, suppliers, customers, business partners, service providers and consultants, necessary actions shall be applied within the framework of the relevant contractual provisions, undertakings and Company procedures, including the suspension, restriction or termination of the business relationship.

Depending on the nature of the breach and applicable legislation, notifications shall be made to competent authorities, reports shall be submitted to regulatory bodies or referrals shall be made to administrative/judicial authorities where necessary. The Company does not tolerate retaliation against persons who make reports in good faith.

In situations that give rise to, or may potentially give rise to, a conflict of interest, employees, managers, members of the Board of Directors and relevant parties acting on behalf of the Company are required to disclose such situation in a timely manner and in writing. Conflict of interest declarations shall be obtained at least annually and on an event-driven basis through the Conflict of Interest Declaration Form; declarations received shall be recorded, monitored and retained confidentially by the Internal Control and Supply Chain Compliance Officer in the Conflict of Interest Declaration Register.

6. PUBLICATION AND TRANSPARENCY OF THE POLICY

This Policy is published and made accessible to relevant stakeholders through the Company's official website and appropriate communication channels. In line with the principle of transparency, the Company undertakes to keep the Policy publicly available, accessible and up to date.

Related Documents:

- Environmental Policy
- Occupational Health and Safety Policy
- Human Rights Policy
- Quality Policy
- Precious Metals Responsible Supply Chain Policy
- Ethics and Compliance Violations Reporting Form
- Conflict of Interest Declaration Form
- Conflict of Interest Declaration Register

7. APPROVAL AND EFFECTIVENESS

This Policy was approved by the Board of Directors on 11/08/2026 and entered into force on the same date.

The Policy is reviewed by the responsible function at least once a year and additionally whenever there is a material change in applicable legislation, standards, the organisational structure, activities or the Company's risk profile.

In the event of any inconsistency, conflict or difference in interpretation between the English translation of this Policy and the Turkish text, the Turkish text shall prevail.

Document Information	Description
Board Resolution Date	11/08/2026
Board Resolution Number	2026-05
Effective Date	11/08/2026
Version No.	01
Revision No.	00
Document ID	POL.26
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Last Review Date	07/08/2026
Next Review Date	05/08/2027
Publication Date	09/09/2026