

ENVIRONMENTAL POLICY

1. PURPOSE AND SCOPE

The purpose of this Policy is to establish the fundamental principles of KÂR Katılım Altın Rafinerisi A.Ş. ("the Company") regarding the prevention or mitigation of environmental impacts arising from its activities, the efficient use of natural resources and the continual improvement of its environmental performance.

This Policy aims to make environmental protection and pollution prevention an integral part of the Company's business decisions, production processes and investment plans.

This Policy applies to all Company activities, facilities and projects that may have an impact on the environment, including production, laboratory operations, storage, maintenance, utility operations, administrative activities, transportation and waste management.

Employees, contractors, suppliers and other parties operating on Company premises shall comply with the provisions of this Policy to the extent applicable to the nature of their activities and within the Company's sphere of control or influence.

2. FUNDAMENTAL PRINCIPLES AND OUR COMMITMENTS

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

- To comply with applicable environmental legislation, permit and licence conditions, administrative requirements and other compliance obligations adopted by the Company, and to regularly monitor relevant changes.
- To establish, implement, maintain and continually improve the environmental management system certified to ISO 14001:2015.
- To assess the environmental aspects arising from the Company's activities, products and services by taking into account a life cycle perspective, risks and opportunities, and normal, abnormal and emergency operating conditions.
- To prevent the pollution of air, water and soil and to manage risks relating to emissions, discharges, noise, odour, leaks and spills through appropriate technical and administrative controls.
- To reduce waste generation at source, prioritise reuse, recovery and recycling, and ensure that hazardous and other waste is classified, stored, transported and disposed of in accordance with applicable legislation.
- To implement practices that protect the environment and human health in the selection, labelling, storage and use of chemicals and in spill response activities.

- To promote the efficient use of energy, water, raw materials and other natural resources and to establish objectives aimed at reducing losses, leaks and waste.
- To assess both the effects of climate change on the Company and the effects of the Company's activities on the climate, and to consider climate change mitigation and adaptation opportunities in investment and operational decisions.
- To consider environmental performance, resource efficiency and the most appropriate available clean technologies when making decisions relating to new investments, equipment, processes and products.
- To identify potential environmental emergencies and improve preparedness through response plans, appropriate equipment, assignment of responsibilities, training and drills.
- To strengthen the environmental awareness of employees and third parties working on Company premises through training, instructions and communication activities.
- To assess the environmental performance of suppliers and contractors on a risk-based basis and to promote appropriate conduct through contractual requirements and site rules.
- To establish measurable environmental objectives and targets, monitor performance and regularly report the results to senior management.

3. DUTIES AND RESPONSIBILITIES

- The Board of Directors approves the Policy and provides oversight of environmental management activities.
- General Management provides the resources necessary for the implementation of the environmental management system and ensures that environmental performance is incorporated into business decisions.
- The function responsible for environmental management monitors legal requirements, permits and licences; coordinates environmental aspect and risk assessments; maintains measurement and waste records; and reports on environmental performance.
- Managers responsible for the relevant activities control the environmental impacts within their areas of responsibility and ensure that employees act in accordance with applicable instructions.
- All employees and third parties working on Company premises comply with environmental rules and immediately report incidents, leaks, nonconformities and improvement opportunities.

- The functions responsible for procurement and contracting processes ensure that relevant environmental requirements are incorporated into supplier and contractor criteria where appropriate.

4. MONITORING, RECORD-KEEPING AND FEEDBACK

4.1. Monitoring and Record-Keeping

- Environmental performance is monitored through indicators relating to energy and water consumption, waste quantities, recovery and recycling, emissions and discharge results, environmental incidents, complaints, permit conditions and progress towards established objectives and targets.
- Legal compliance evaluations, site inspections, internal audits, management reviews and any necessary measurements or analyses are conducted in a planned manner.
- Significant environmental incidents and breaches of applicable legislation are reported to General Management without delay, and root cause analysis and corrective action are undertaken.

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

Conduct contrary to this Policy, the Company's policies and procedures, ethical principles or applicable legislation shall be deemed a breach. Necessary administrative, disciplinary, contractual and/or legal action shall be taken by considering the nature, severity, recurrence and impact of the breach and the status of the relevant party.

For employees, appropriate disciplinary and administrative action shall be taken in accordance with applicable labour legislation, employment contracts, ethical principles and relevant internal Company rules. For third parties, suppliers, customers, business partners, service providers and consultants, necessary action,

including suspension, restriction or termination of the business relationship, shall be taken in accordance with the relevant contractual provisions, commitments and Company procedures.

Depending on the nature of the breach and the applicable legislation, the competent authorities shall be notified, regulatory reports shall be submitted or judicial/administrative authorities shall be contacted where necessary. The Company shall not tolerate retaliation against any person who reports a concern 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:

- Sustainability Policy
- Occupational Health and Safety Policy
- Quality 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.

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