

2025



ODAS'S ENVIRONMENTAL POLICY

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01 Purpose and Scope

As ODAŞ Elektrik Üretim Sanayi Ticaret AŞ ("ODAŞ") and its subsidiaries ("ODAŞ Group Companies"), we consider environmental sustainability a fundamental priority while conducting our operations. We recognize environmental management not only as a legal obligation, but also as an integral part of our corporate values and sustainability approach.

We assess the environmental impacts of our operations from a broad perspective, including climate change, use of natural resources, biodiversity, and protection of the environment; and we identify and manage environmental risks and opportunities. We are fully committed to operating in compliance with national and international environmental legislation and standards, continuously improving our environmental performance, and establishing an open and transparent communication with our stakeholders.

02 Principles and Commitments

As Odaş, the key principles of our environmental approach are as follows:

- Recognizing the prevention and reduction of pollution affecting air, water, soil, and ecosystems arising from our operations as a fundamental responsibility.
- Preventing and minimizing pollution affecting air, water, soil, and ecosystems arising from our operations as a fundamental responsibility.
- Identifying and preventing sources of pollution before they occur and, where prevention is not possible, minimizing their impacts through the application of best available techniques and innovative technologies.
- Prioritizing the reduction of energy and natural resource consumption and supporting their efficient use through innovative technologies and best practice approaches.
- Systematically monitoring and reporting our greenhouse gas emissions and reducing our Scope 1 and Scope 2 greenhouse gas emissions by 10% by 2035.
- Reducing waste at source, promoting recycling, ensuring proper disposal, and supporting its use as an alternative raw material.
- Managing water resources sustainably, using water efficiently and responsibly, and evaluating opportunities for water recovery and reuse.
- Protecting natural habitats and preserving biodiversity.
- Promoting environmental awareness among our employees, business partners, suppliers, and other stakeholders through dedicated awareness and engagement initiatives.
- Monitoring and continuously improving our environmental performance through independent audits and transparent reporting.
- Integrating environmentally responsible decision-making mechanisms into our governance processes

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and embedding sustainability principles across all our operations.

- Prioritizing environmental efficiency in our production capacity through the effective use of technology, infrastructure, financial resources, and human capital.
- Ensuring the regular review of our environmental performance under the leadership of senior management and fostering a culture of continuous improvement throughout the organization.
- As a signatory to the United Nations Global Compact (UNGC), transparently reporting our environmental and social performance to stakeholders and promoting technologies and systems that prevent adverse impacts at their source throughout our operations.
- Applying the mitigation hierarchy in managing environmental impacts—first avoiding, then minimizing, followed by restoring, and finally offsetting impacts—and prioritizing rehabilitation and restoration activities whenever feasible.

We review our environmental performance through independent internal and external audits and report the results to senior management. We evaluate the effectiveness of our processes at annual review meetings. We revise our action plans based on feedback from our stakeholders. We are fully committed to protecting and improving the environment and human health.

03 Enforcement

ODAŞ's Environmental Policy has entered into force as of 25.07.2025, pursuant to the Board of Directors' Decision dated 25.07.2025 and numbered 2025/10. The effective date and version information of the policy shall be clearly stated in the document. The policy is published and made available on internal company systems and the corporate website.

ODAŞ's Ethics Committee is responsible for implementing, monitoring, and assessing the effectiveness of the policy. Within this scope, ODAŞ's Ethics Committee identifies risks in the implementation of policies, reviews the received ethics reports, monitors the system's effectiveness regarding violations, and recommends corrective actions when necessary. Recommendations for revisions are drawn up by the ODAŞ Ethics Committee and implemented by the Board of Directors. Updated policy documents are clearly communicated to all employees and relevant stakeholders.

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