

Turkish Petroleum Refineries Corporation

Environmental Management Policy

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1. Purpose and Scope

This policy includes Tüpraş's vision and approach in relation to Environmental Management standards aligned with Koç Holding. Being aware of climate change and its impacts, Tüpraş has committed to be carbon neutral by 2050. Tüpraş, a systematic follower of the climate-related risks, has adopted an environmentally respectful management with the vision of "Our Energy for the Future". This policy is prepared to outline Tüpraş's principles about integrated environmental management and to align all employees and stakeholders around this policy.

All subsidiaries and employees of Tüpraş shall comply with this Policy. Also, Tüpraş expects all the stakeholder groups in its value chain to take necessary measures and actions to fulfill the commitments outlined in this Policy.

2. Definitions

"Koç Group" means Koç Holding A.Ş., companies which are controlled directly or indirectly, jointly or individually by Koç Holding A.Ş. and the joint venture companies listed in its latest consolidated financial report.

"Tüpraş" means Türkiye Petrol Rafinerileri A.Ş. and all companies directly or indirectly, individually, or jointly controlled by this company, and business partnerships included in Tüpraş's consolidated financial report.

Stakeholders: It includes 13 groups in Tüpraş Stakeholder Management: Employees, Shareholders and Investors, Business Partners, Customers, Suppliers, Financial Institutions, Public Institutions and Organizations, Non-Governmental Organizations, National and International Initiatives, Trade Unions, Educational Institutions, Universities and Research Institutions, Media, Affiliates and Subsidiaries.

United Nations Sustainable Development Goals: The United Nations Sustainable Development Goals (SDGs), also known as the Global Goals, are a set of 17 interconnected aspirations adopted by all United Nation member states in 2015. They represent a universal urgent call to action to end poverty, protect the environment, tackle climate change, ensure peace and prosperity for all by 2030.

United Nations Global Compact: It refers to the convention based on the universally accepted United Nations declarations for social responsibility and sustainability practices, which deals with 10 basic areas of responsibility of the business world in the fields of human rights, labor standards, environment and anti-corruption.

Best Available Techniques: It refers to the most effective, advanced, applicable, clean production techniques, whose technological and economic sustainability is internationally accepted in the highest level of protection of the environment as a whole, and which form the basis of the requirements of the Green Transformation in Industry document.

National Environmental Legislation: It is a set of legal regulations created in order to ensure that businesses operating in Turkey operate without harming the environment and keeping their environmental impacts under control.

Environmental Management System: It is a comprehensive and systematic management tool that a business uses to control its environmental impacts, adopt sustainable practices and continually improve its environmental performance.

3. General Principles

Tüpraş adopts a responsible and respectful approach to the environment by focusing on improving its environmental performance and reducing the environmental impacts of its activities in the light of United Nations Sustainable Development Goals and the United Nations Global Compact.

Tüpraş implements projects which reduce and continuously improve the environmental impact in production processes while fulfilling its responsibilities within the scope of National Environmental Legislation. Technology and process choices are made in accordance with Best Available Techniques in the design of new projects, taking into account all environmental impacts.

4. Policy Principles

As Tüpraş, while meeting our country's energy needs without interruption, we continue to work with all our strength to produce sustainable value together with our all our stakeholders in all our business processes and activities.

In line with its Strategic Transition Plan, Tüpraş is committed to;

- Comply with all national and legal regulations and other obligations related to the environment arising from activities,
- Implement national and international sector specific standards and best practices to reduce or eliminate environmental impacts with the awareness that resources on Earth are non-infinite,
- Take environmental action beyond regulatory compliance,
- Determine risks and opportunities and take necessary precautions to reduce environmental risks by integrating an Environmental Management System into the workflows and strategy,
- Implement and promote Tüpraş's sustainability principles throughout all workflows,
- Become carbon-neutral by 2050 by reducing gradually Scope 1 and 2 emissions,
- Report in accordance with national and international standards related to Scope 3 greenhouse gas emissions from the perspective of impact management in the value chain,
- Contribute tackling the climate change and focus on sustainability by taking into account the risks and opportunities related with the climate change and sustainability,
- Enact policies, strategies, actions that will help to adapt to the effects of climate change,
- Develop and implement energy efficiency projects,
- Not invest in fossil-fuel expansion,

- Realize and increase renewable and clean energy investments to reduce greenhouse gas emissions stemming from our operations,
- Protect natural resources and utilize them in the most efficient way, increase recycling and reuse,
- Analyze water risks arising from the operations on a scenario basis and conduct studies to manage these risks proactively,
- Reducing basin-based water stress through effective operational water management and collective action in locations where operations take place,
- Reduce raw water withdrawal, consumption and water footprint with stakeholders, and evaluate operational opportunities by analyzing alternative water resources,
- Reuse and recycle the wastewater generated from the operations,
- Protect aquatic ecosystems and reduce water pollution by reducing the impact of sectoral wastewater parameters and hazardous substances on the receiving environment with treatment and/or recovery applications
- Focus on water efficiency and water conservation,
- Prioritize the prevention of waste generation, reduction of waste, increase reuse, recycling, recovery and the use of waste as a resource as much as possible in line with the principles of zero waste and circular economy,
- Identify and manage spill risks (soil, underground, surface water) arising from operations,
- Monitor and improve the impacts of operation to air quality continuously,
- Manage pollution prevention or reduce its negative effects with life cycle thinking, and to increase efficiency,
- Support the improvement of biodiversity, focus on protecting all species in the long term, especially endangered species, protected species and endemic species, and natural ecosystems in a way that prevents land degradation and negative effects,
- Aim to manage and reduce impacts on biodiversity in a sustainable manner,
- Carry out R&D and Innovation projects to improve environmental performance,
- Evaluate environmental impacts in all investments and projects, implement the best available techniques that enable reduction in the environmental impact,
- Set goals, improve environmental performance, plan the actions and review the goals constantly and create the necessary resources to achieve these goals,
- Monitor, improve and develop environmental performance with digital technologies,
- Develop sector-specific environmental solutions by closely following the developments in technology,
- Carry out communication and cooperation studies with relevant institutions and organizations in the development of legal regulations, other requirements, policies and standards related to environmental management,
- Ensure that all suppliers adhere to environmental regulations where they operate and apply best practices, promoting sustainable sourcing and production methods to minimize the environmental impacts of our entire supply chain by ensuring effective communication,
- Comply with the environmental goals of Koç Holding,
- Develop capacity, promote and maintain environmental awareness through training and awareness activities on environmental issues throughout the entire value chain,

especially among employees, contractors and subsidiaries to reduce environmental impacts,

- Determine the Priority Topics in terms of environmental, social and governance with the participation of stakeholders,
- Conduct operations by taking all of the United Nations Sustainable Development Goals and the United Nations Global Compact principles as a guide,
- Evaluate the impacts of Tüpraş activities on the environment and humans in terms of “environmental and social materiality” and the impacts of environmental and social issues on Tüpraş activities in terms of “financial materiality” by adopting the Double Materiality method,
- Be the leader in effective environmental management in the sector and share the best practices,
- Ensure consistency between the company's environmental management policy and the positions it adopts in trade associations, non-governmental organizations, professional chambers and any similar organization of which it is a member,
- Make relevant regulations and assignments within the company regarding the relevant policies and responsibilities on environmental management and sustainability,
- Publish this policy and all environmental related policies in a way that all stakeholders can access.

5. Responsibilities

Compliance with this Policy is mandatory for all parties associated with Tüpraş, including refineries, employees and affiliates. Additionally, Tüpraş actively promote this Policy to all of their stakeholders and take steps to ensure their adherence, either through direct compliance or alignment with its principles.

The Environmental Management Policy is published and updated under the coordination of the Head of Environment of the Tüpraş Technical Safety Executive Directorate, with the approval of the Board of Directors, in consultation with the Strategy and Sustainability Directorate and the Technical Services Executive Directorate. If you become aware of any action that you believe is inconsistent with this Policy, you may seek guidance or report the incident to your line managers or Head of Environment of the Tüpraş Technical Safety Executive Directorate.

If there is a discrepancy between the local regulations applicable in the countries Tüpraş operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local laws and regulations.

6. Revision History

This Policy takes effect with the approval of the Board of Directors dated 13.06.2025 and numbered 22 and will be maintained by the Head of Environment Department.

All changes to the Policy must be approved by the Tüpraş Board of Directors.

Revision	Date	Comment
-	13.06.2025	Approval of Policy