

 BOZLUholding	ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE POLICY	Belge No	BZL.İSG.POL.004
		Revizyon No	0
Yayın Tarihi		07.06.2024	
Revizyon Tarihi			
Sayfa No		1/7	
İSG Politikaları			

BOZLU HOLDING INCORPORATION

ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE POLICY

Version 0.1

JAN 1, 2024

HAZIRLAYAN İSG BİRİMİ	ONAYLAYAN GENEL MÜDÜR	YÜRÜRLÜK ONAYI YÖNETİM KURULU
--------------------------	--------------------------	----------------------------------

KontROLSÜZ KOPYA

 İSG Politikaları	ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE POLICY	Belge No	BZL.İSG.POL.004
		Revizyon No	0
		Yayın Tarihi	07.06.2024
		Revizyon Tarihi	
		Sayfa No	2/7

1. PURPOSE AND SCOPE

One of the main principles of Bozlu Group's1 values and tradition of service production is respect for the environment and society. Accordingly, Bozlu Group and its companies shall consider supporting sustainable development and achieving business success through sustainable business models as a responsibility to improve the living standards of the society and protect the environment.

Thus, Bozlu Group Companies shall support Sustainable Development Goals of the United Nations. They shall monitor and measure the "environmental, social and corporate governance" (ESG) impacts arising from their activities and services throughout their value chain, and make the necessary improvements according to the results obtained and ensure their continuity. Within the scope of these activities, which are called ESG Management, short, medium and long term ESG risks and opportunities shall be assessed and managed.

The UN Global Compact, the UN Women's Empowerment Principles ("WEPs") and the World Economic Forum Stakeholder Capitalism Metrics ("WEF Stakeholder Capitalism") are among the international initiatives shaping ESG efforts across the Group.

This Policy sets out the main principles to be followed in Bozlu Group's ESG Management processes. The term ESG Management covers the management of social, economic, environmental and corporate governance issues and can also be referred to as "sustainability management" by Bozlu Group and its Companies.

The principles stated in this Policy are binding for all activities, managers and employees of Bozlu Group. Group Companies shall comply with the principles indicated in this Policy, implement the practices and processes specified in the Policy within the company and/or participate in the practices and processes established by Bozlu Group.

Bozlu Group companies shall work with suppliers and business partners who adopt the principles listed in this Policy and endeavour to ensure that the principles are adopted and disseminated by their business partners and suppliers.

"Bozlu Holding" refers to the companies in which Bozlu Holding and/or its shareholders and managers have shares. "Bozlu Holding" refers to Bozlu Holding Inc.

HAZIRLAYAN İSG BİRİMİ	ONAYLAYAN GENEL MÜDÜR	YÜRÜRLÜK ONAYI YÖNETİM KURULU
--------------------------	--------------------------	----------------------------------

KontROLSÜZ KOPYA

 BOZLUholding	ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE POLICY	Belge No	BZL.İSG.POL.004
		Revizyon No	0
İSG Politikaları		Yayın Tarihi	07.06.2024
		Revizyon Tarihi	
		Sayfa No	3/7

The procurement and supply processes, starting from the tender and including the processes after the termination of the cooperation, shall be regulated by a contract with mechanisms to monitor and measure compliance with ESG principles and policies.

2. ESG MANAGEMENT

- In accordance with the operating principles of Bozlu Group, all Group Companies shall observe full compliance with the national laws to which they are subject in their activities and international obligations defined by intergovernmental agreements.
- Bozlu Group shall assess the positive or negative social, economic and environmental risks and opportunities that may arise on the company, its stakeholders, socioeconomic and physical environment due to its products and services. It shall also take the identified risk and opportunity areas as a basis when establishing its ESG Policy. As a result of these assessments, Bozlu Group shall determine its ESG (sustainability) priorities.
- In the process of determining ESG priorities, the UN Sustainable Development Goals ("SDGs") shall also be taken into consideration, and SDGs related to ESG priorities shall also be considered within the scope of priority aspects.
- Bozlu Group shall take ESG priorities into consideration when determining all business strategies, particularly investment, production, trade and human resources management.
- Bozlu Group shall carry out ESG management activities with targets in line with company strategies and the principle of continuous improvement, develop implementation plans in line with the set targets, and monitor performance with Key Performance Indicators (KPIs). It shall take into account the ESG Policy when setting short and long term targets.
- Bozlu Group shall develop internal procedures and processes to ensure the efficiency of ESG management activities.
- Bozlu Group shall adopt ESG priorities as a continuous improvement area and carry out performance improvement activities for business processes, products and services in order to improve its ESG performance.
 - Bozlu Group shall utilise the expectations and opinions of its stakeholders in the planning and execution processes of ESG activities, and create systematic tools to facilitate the inclusion of stakeholder views and expectations in management decision-making processes.
 - Bozlu Group shall aim to increase collaborations and investments within the scope of ESG. In

HAZIRLAYAN	ONAYLAYAN	YÜRÜRLÜK ONAYI
İSG BİRİMİ	GENEL MÜDÜR	YÖNETİM KURULU

 BOZLUholding	ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE POLICY	Belge No	BZL.İSG.POL.004
		Revizyon No	0
İSG Politikaları		Yayın Tarihi	07.06.2024
		Revizyon Tarihi	
		Sayfa No	4/7

this direction, it shall endeavour to research and use new technologies and support related initiatives.

- Bozlu Group shall support the work of national and international initiatives and non-governmental organisations towards their common goals for sustainable development and follow the developments in the field of sustainability.

3. ESG GOVERNING BODIES OF BOZLU GROUP

It shall carry out tasks such as ensuring the effectiveness of policies, strategies, governance bodies and tools related to sustainability management applicable throughout the Group, assessing the validity of strategic priorities, and making recommendations on social, economic and environmental issues. The management of ESG activities at Bozlu Group level shall be carried out by the Bozlu Group Compliance Committee.

Bozlu Group Compliance Committee is a strategic decision-making body composed of Director General, Legal Counsel, Human Resources Manager and OHS and DGSA Coordinator of Bozlu Holding Inc. and is responsible to the Board of Directors. The main purpose of the Board is to strategically manage sustainability issues covering environmental, social and corporate governance areas throughout the Group.

Working Groups, which are responsible for the implementation of the Group's strategies, policies and targets on ESG and for making recommendations by following the developments in the world, are the bodies established to ensure that the Group's sustainability strategies are transformed into targets and action plans.

Group Companies that are suitable in terms of their field of activity and scope of operation may implement, within their own organisations, a similar management organisation to the one established for the Group as a whole in Bozlu Group.

4. ESG (SUSTAINABILITY) PRIORITIES OF BOZLU GROUP

The scope of Bozlu Group ESG Management is determined by following the principles and tools recommended by international standards with a risk and opportunity-oriented approach, and by evaluating stakeholder expectations and opinions. Bozlu Group ESG Priorities shall be determined through studies carried out when necessary. SDGs that are considered relevant to ESG priorities shall also be considered as part of ESG management.

HAZIRLAYAN	ONAYLAYAN	YÜRÜRLÜK ONAYI
İSG BİRİMİ	GENEL MÜDÜR	YÖNETİM KURULU

	ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE POLICY	Belge No	BZL.İSG.POL.004
		Revizyon No	0
İSG Politikaları		Yayın Tarihi	07.06.2024
		Revizyon Tarihi	
		Sayfa No	5/7

The priorities of Bozlu Group ESG identified as a result of the most recent prioritisation study are listed in Table 1:

Table-1: ESG Priorities of Bozlu Group

Priority Issues	Relevant Sustainable Development
Climate and Environment	SDG3- Good Health and Well-Being
Equal Opportunity, Inclusion and Diversity	SDG4- Quality Education SDG5- Gender Equality
Occupational Health and Safety	SDG6- Clean Water and Sanitation SDG7- Affordable and Clean Energy
Business Ethics and Legal Compliance	SDG8- Decent Work and Economic Growth
Innovation and Entrepreneurship	SDG10- Reducing Inequalities
Digital Transformation	SDG12- Responsible Production and Consumption

5. REPORTING

The targets pursued within the scope of Bozlu Group ESG Management, the activities implemented in this direction and the performance achieved shall be presented to the Board of Directors once a year by the Bozlu Group Compliance Committee

Bozlu Group and Group Companies deemed appropriate in terms of their activities may disclose their performances, targets and actions for ESG priorities to the public in the periods to be determined through reports prepared in accordance with internationally recognised

systems and standards, primarily GRI Standards, which are deemed appropriate in terms of implementation, and implementation frameworks determined by voluntary initiatives, adhering to transparency and objectivity criteria.

6. OTHER RELEVANT POLICIES

The resources prepared and published within the company for the issues prioritised within the scope of Bozlu Group's ESG Management specified in this document and accepted as part of this policy are listed

HAZIRLAYAN	ONAYLAYAN	YÜRÜRLÜK ONAYI
İSG BİRİMİ	GENEL MÜDÜR	YÖNETİM KURULU

 BOZLUholding	ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE POLICY	Belge No	BZL.İSG.POL.004
		Revizyon No	0
İSG Politikaları		Yayın Tarihi	07.06.2024
		Revizyon Tarihi	
		Sayfa No	6/7

below:

- Bozlu Group's Environment and Climate Change Policy
- Bozlu Group's Gender Equality and Human Rights Policy
- Bozlu Group's Occupational Health and Safety Policy

7. RESPONSIBILITY FOR IMPLEMENTATION

This Policy has been established by the Bozlu Group Compliance Committee and entered into force upon the approval of the Board of Directors.

The Senior Management of the Group Companies are responsible for overseeing the implementation of the articles in the Policy in the Group Companies, and the business units of the Group Companies are responsible for the implementation of the Policy in the companies, limited to their own areas of responsibility. The responsibility for overseeing the implementation of this Policy throughout the Group lies with the Bozlu Group Compliance Committee.

The Boards of Directors of the Group Companies may delegate their powers and responsibilities under the Policy to persons authorised by them from within the company by following the necessary procedures and principles in accordance with the legislation. In such a case, the Boards of Directors shall ensure high-level supervision and oversight of the persons to whom powers and responsibilities are delegated.

Bozlu Group Companies also expects its suppliers and business partners to act in accordance with this policy.

8. MONITORING OF THE POLIC

This Policy shall be reviewed and evaluated annually by the Bozlu Group Compliance Committee. In case of a significant change, the Policy shall be harmonised with the changes by the Bozlu Group Compliance Committee. Amendments to the Policy shall enter into force upon the approval of the Board of Directors.

9. APPLICATIONS AND COMPLAINTS

Information requests, suggestions and complaints regarding the Policy can be submitted anonymously via the bozLU notification channel (online form link should be given) or via the e-mail address uyum@bozlu.com.

HAZIRLAYAN İSG BİRİMİ	ONAYLAYAN GENEL MÜDÜR	YÜRÜRLÜK ONAYI YÖNETİM KURULU
--------------------------	--------------------------	----------------------------------

KontROLSÜZ KOPYA

 BOZLUholding	ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE POLICY	Belge No	BZL.İSG.POL.004
		Revizyon No	0
Yayın Tarihi		07.06.2024	
Revizyon Tarihi			
Sayfa No		7/7	
İSG Politikaları			

No counter behaviour or attitude shall be displayed towards employees or other stakeholders who make notifications and complaints in good faith regarding behaviours contrary to the norms within the scope of this Policy.

HAZIRLAYAN İSG BİRİMİ	ONAYLAYAN GENEL MÜDÜR	YÜRÜRLÜK ONAYI YÖNETİM KURULU
--------------------------	--------------------------	----------------------------------

KontROLSÜZ KOPYA