Cengiz Holding A.S.

Biodiversity Policy

Revision No : 00
Revision Date : 02.04.2026

1. Purpose and Scope

The Biodiversity Policy ("Policy") has been prepared to define the principles, fundamental guidelines, governance approach, and corporate commitments of Cengiz Holding A.Ş. and its affiliated Group Companies **("Cengiz Holding", "Holding", or "Group")** regarding the conservation and management of biodiversity in all their activities.

The policy demonstrates that Cengiz Holding is aware of the impacts of biodiversity loss on ecosystem services, climate resilience, water and soil resources, and societal well-being; and that it considers biodiversity conservation an integral part of environmental sustainability in all its operations.

The aim of the policy is to define the basic approach and expectations for identifying, assessing, and managing the impacts on biodiversity throughout the project lifecycle; to address risks through a preventive approach; to mitigate nonconformities; and to encourage remedial practices where appropriate.

2. Definitions

Biodiversity: The variety of all living species found in ecosystems and the totality of the relationships between these species.

Critical habitat: Refers to areas with a high level of sensitivity where species and ecosystems of high importance for conservation are found.

Protected area: Refers to areas that have protection status under national legislation or international agreements.

Sharing: Refers to all individuals, entities, and organizations (employees, business partners, suppliers, public authorities, non-governmental organizations, local communities, and customers) that are affected by or may affect Cengiz Holding's activities.

Equator Principles: A voluntary risk management framework adopted by financial institutions for identifying, assessing, and managing environmental and social risks in large-scale project financing and related financing transactions.

IFC Standards: A set of standards from the International Finance Corporation (IFC) that defines expectations and requirements for managing environmental and social risks and impacts in investment and project financing.

EBRD (European Bank for Reconstruction and Development): Performance requirements that define the minimum expectations and requirements for the management of environmental and social risks and impacts in projects financed by the European Bank for Reconstruction and Development (EBRD).

3. Policy Principles

Cengiz Holding considers it its duty to identify, evaluate, and manage the impacts of its activities on biodiversity throughout the project lifecycle. In this context, it fully complies with relevant national legislation, permit and license obligations, and local requirements;

international best practice approaches and standards are considered where necessary. In assessing biodiversity risks in large-scale investments that may pose environmental and social risks, the Equator Principles, IFC (International Finance Corporation) Performance Criteria and/or EBRD (European Bank for Reconstruction and Development) Performance Requirements are adopted as guidelines. A preventive approach is taken when managing biodiversity risks; therefore, priority is given to avoiding impacts at the earliest possible stage, minimizing impacts where avoidance is not possible, mitigating impacts and considering compensatory measures where deemed necessary.

Cengiz Holding considers biodiversity sensitivity in site selection and new project development processes; it meticulously evaluates potential impacts in protected areas, critical habitats, and regions important for species conservation. In highly sensitive areas such as World Heritage sites and areas with specific protection statuses, operational decisions are approached with a focus on impact avoidance; we act in coordination with the relevant authorities and seek expert opinions when deemed necessary. Measures are being developed to protect endangered or protected species and habitats critical to ecosystem integrity; opportunities for collaboration with experts and sharers are being evaluated.

Cengiz Holding aims not only to mitigate negative impacts but also to make positive and beneficial contributions to biodiversity in appropriate areas and conditions. In this context, habitat rehabilitation, ecological restoration practices compatible with local species, and biodiversity-focused social responsibility projects are encouraged in the areas. In supply chain and procurement processes, awareness is being developed regarding practices that may increase risks to biodiversity; expectations are being created from suppliers and business partners to comply with relevant environmental obligations and take necessary precautions.

Cengiz Holding aims to integrate its efforts to identify and effectively manage environmental risks and opportunities into its corporate decision-making processes; in this regard, it aims to include transparent disclosures on environmental risks and opportunities in its annual corporate sustainability reports.

4. Implementation, Authority and Responsibilities

All Cengiz Holding employees and external sharers are obligated to comply with the provisions of this Policy. If a violation of the Policy is detected, the matter should be addressed immediately:

- Legal Directorate
- Corporate Sustainability and Environment Directorate;

Other departments and employees involved in the process will be notified.

The Corporate Sustainability and Environment Directorate and the Legal Directorate are jointly responsible for overseeing the implementation, communication with employees, and enforcement of the policy.

5. Monitoring, review and entry into force

Biodiversity performance is monitored through field audits, monitoring studies, and progress of action plans; a continuous improvement approach is adopted based on the findings. The policy is reviewed regularly in light of legislative changes, international standards, and updates to company processes.

The policy comes into effect upon approval by the Board of Directors

6. History of Revision

Revision No.	Revision Date	Description
00	02.04.2026	First published