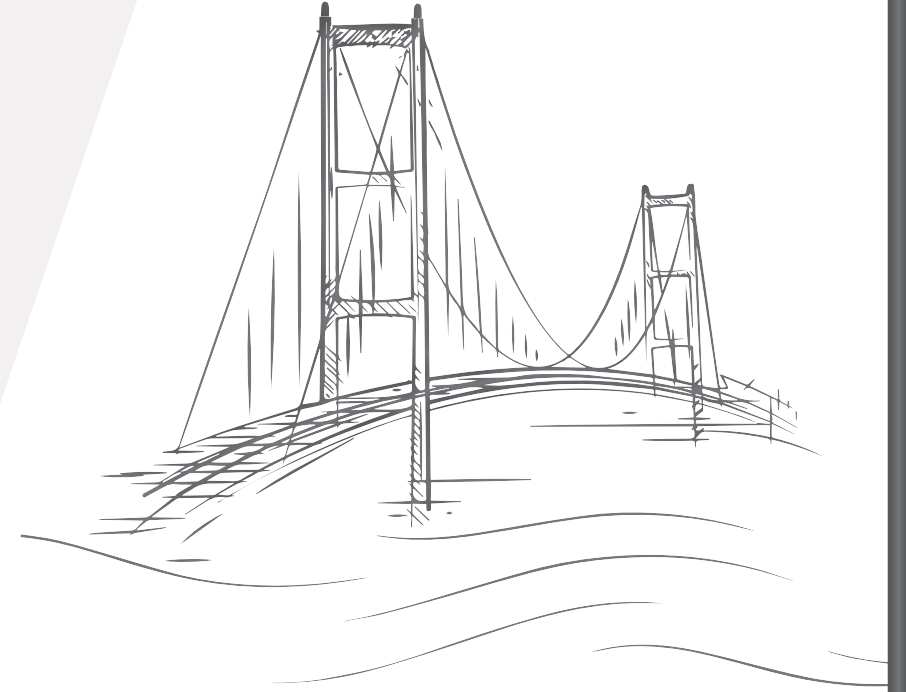


**ÇANAKKALE MOTORWAY AND BRIDGE**  
**ENVIRONMENTAL AND SOCIAL**  
**SUSTAINABILITY POLICY**



**1915 ÇANAKKALE**

## INTRODUCTION

Through this Policy, Çanakkale Otoyol ve Köprüsü İnşaat Yatırım İşletme A.Ş. (ÇOK A.Ş.) aims to ensure that all its stakeholders with awareness of sustainability as well as environmental, social, health, safety and security considerations throughout all business processes. In this regard, it encourages all stakeholders to take responsibility for minimizing adverse environmental and social impacts. Environmental and social responsibility refers to an employee or stakeholder conducting their activities with consideration not only for commercial interests but also for environmental and social impacts.

Any situation that hinders its employees and business partners from carrying out their activities in an environmentally and socially conscious, sustainable, and legally compliant manner -or that creates a negative perception in this regard- may constitute an environmental and social risk. In order to prevent existing or potential environmental and social risks, ÇOK A.Ş. expects all stakeholders to act in accordance with the ÇOK A.Ş. Environmental and Social Sustainability Policy, sustainability principles, and all applicable environmental legislation.

ÇOK A.Ş. is committed to maintaining and enhancing a constructive culture in terms of health, safety, security, social matters, and the environment.

## WHAT IS THE PURPOSE OF THIS POLICY?

This Policy provides a foundation for integrating the environmental and social responsibility framework into all business processes of ÇOK A.Ş. and its stakeholders. ÇOK A.Ş. aims to act in accordance with the environmental and social management principles and sustainability commitments to which it is bound. Within the scope of this Policy, it sets out the obligations of all employees and business partners and defines the processes to be followed to prevent social, environmental, health, and safety-related risks. Furthermore, it provides guidance on the channels to be used in the event of policy violations or the identification of environmental and social risks.

## WHO IS SUBJECT TO THIS POLICY?

All of the stakeholders listed below are required to act in accordance with this Policy and align their business processes with the principles stated herein:

- ÇOK A.Ş. employees and managers
- ÇOK A.Ş. suppliers
- All other third-parties (consultants, intermediaries etc.)

This Policy enables ÇOK A.Ş. to reflect its commitment to environmental and social sustainability regulations and assigns the responsibility to collaborate across all levels of the organization, including contractors, subcontractors, and independent suppliers.

## FUNDAMENTAL PRINCIPLES

- All stakeholders of ÇOK A.Ş. understand that protecting the environment is a shared responsibility and are committed to actively contributing to the development of environmental awareness and sensitivity and to ensuring that this policy is communicated to all organizational levels, contractors, subcontractors, and independent suppliers.
- ÇOK A.Ş. commits to fully comply with all applicable legal regulations and other requirements related to environmental management, while also prioritizing the integration of national and international environmental standards into its business operations. In this regard, it cooperates and engages with relevant institutions and organizations to contribute to the development and continuous improvement of environmental policies. Within this scope, ÇOK A.Ş. commits to comply with all applicable legal permits and requirements of credit institutions.
- With a focus on environmental sustainability in its production processes, ÇOK A.Ş. aims to utilize natural resources efficiently and to take measures to identify and minimize the environmental risks.

- ÇOK A.Ş. ensures that all main contractors establish and maintain a comprehensive, effective, and streamlined OHS-E management system in compliance with ISO 45001:2018 and ISO 14001:2015 standards. ÇOK A.Ş. also encourages its contractors to continuously improve their OHS-E management systems and practices.
- ÇOK A.Ş. continuously evaluates the environmental impacts of its activities and undertakes ongoing improvement efforts to minimize any adverse effects on the environment.
- ÇOK A.Ş. aims to establish effective and multifaceted communication with its stakeholders and to understand their environmental expectations and needs. In this regard, ÇOK A.Ş. prioritizes raising awareness. Within this scope, it commits to conducting regular training programs and internal communication activities to enhance employees' environmental responsibility awareness and promote sustainable practices.
- In addition, ÇOK A.Ş. the company ensures that all project employees receive training on OHS-E requirements and ensures that they possess the necessary qualifications before commencing work. ÇOK A.Ş. conducts activities to minimize environmental impacts in its operations by promoting the use of renewable energy sources, determining waste management requirements, improving energy efficiency, and consciously using natural resources.
- ÇOK A.Ş. prioritizes a "Safety First" approach at every stage of the Project.
- By adopting environmental protection as a fundamental principle, ÇOK A.Ş. Management commits to determining measures for pollution prevention and waste management during its construction activities.
- ÇOK A.Ş. commits to taking necessary measures to prevent soil, surface water and groundwater pollution to protect the watersheds and ecosystems used by local communities.
- To minimize environmental, social, and health-related risks, ÇOK A.Ş. undertakes to implement accident prevention and risk mitigation measures in full compliance with legal requirements and the standards set by credit institutions.
- ÇOK A.Ş. will make all necessary efforts to identify cultural assets in a timely manner to protect cultural heritage and comply with Turkish legislation as well as the requirements of credit institutions.
- ÇOK A.Ş. takes the necessary measures to reduce greenhouse gas emissions, reduce the carbon footprint, and adopt sustainable business practices to take

responsibility in the fight against the climate crisis and support the transition to a low-carbon economy.

- ÇOK A.Ş. assesses security risks in line with the culture of the relevant community and does not permit Security personnel to engage in behaviors that could escalate social tension.
- ÇOK A.Ş. undertakes to thoroughly investigate the previous experiences of security companies and/or security personnel during the selection process of security units.

## OUR REPORTING RULES AND COMMUNICATION CHANNELS

ÇOK A.Ş. values the opinions of its stakeholders. We maintain open speak-up mechanisms that encourage feedback from customers, shareholders, employees, and suppliers.

ÇOK A.Ş. commits to establishing a mechanism through which both employees and affected communities can safely express complaints without fear of retaliation, and to ensuring that these complaints are addressed in a timely and effective manner.

ÇOK A.Ş. Management commits to reporting any unlawful actions committed by the security personnel to the authorities under all circumstances.

This Policy supports reporting any action that is considered inconsistent with applicable legislation or ÇOK A.Ş. Code of Ethical Conduct through the speak-up channels listed below:

**Telephone:** You may call **0212 800 65 81**

**E-mail:** You can send an e-mail to **cok.ethics@speak-hub.com**

**Disclose Form:** You can fill out the disclose form on **www.speak-hub.com/cok-ethics**

# DISCIPLINE

---

In the event of any violation of this Policy by third parties, their contracts may be terminated. Any actions that are contrary to this Policy are reviewed and resolved by the Disciplinary Board in accordance with the principles and procedures outlined in the ÇOK A.Ş. Disciplinary Policy.

# DOCUMENT UPDATING, STORAGE AND PUBLICATION

---

ÇOK A.Ş. ensures that this Policy is the most up-to-date version in force and shared through publicly accessible resources. This Policy and all its previous versions are retained indefinitely within ÇOK A.Ş.'s document management systems.

In the event that an update to this Policy is required, the Ethics and Compliance Committee is responsible for making the necessary revisions and for notifying all relevant parties affiliated with this Policy. The Deputy General Manager responsible for Technical Affairs at ÇOK A.Ş. is accountable for ensuring compliance with this Policy and overseeing the implementation of its requirements.

This Policy entered into force with the SPV Directors' decision dated [.....]

**Revision:** 1

**Effective Date:**

**Notes:**