

CLIMATE CHANGE MITIGATION AND ADAPTATION POLICY

1. PURPOSE

The purpose of the Climate Change Mitigation and Adaptation Policy (hereinafter referred to as the “Policy”) is:

- a) To determine and define the scope of climate change-related physical and transition risks identified by Doğuş Construction and Trade Inc. (hereinafter referred to as the “Company”) and the steps that need to be taken for the management of such risks,
 - b) To take the necessary actions for the implementation of climate change-related legislation, national/international standards and systems, and for alignment with the Company’s sustainability strategies,
- and aims to achieve these objectives.

2. DEFINITIONS

In this section, the special terms and concepts used in the Policy are briefly explained as follows.

Company: Doğuş Construction and Trade Inc.

Policy: Climate Change Mitigation and Adaptation Policy

Employee: Refers to the Company’s managers and employees.

Climate Change: According to the United Nations Framework Convention on Climate Change, “Climate Change” is defined as a change in climate that is attributed directly or indirectly to human activity that alters the composition of the global atmosphere and that is in addition to natural climate variability observed over comparable time periods.

3. SCOPE

This Policy covers:

- a) Members of the Company’s Board of Directors,
- b) Company Employees,
- c) Persons and organizations acting on behalf of the Company, including consultants, lawyers, advisors, and external auditors, as well as other persons, including customers with whom the Company has commercial relations (collectively referred to as “Business Partners”), and their employees.

4. PRINCIPLES AND FUNDAMENTALS

Through this Policy, the Company:

- 4.1.** Will consider climate change mitigation and adaptation in all areas of its activities,
- 4.2.** Will address climate change mitigation and adaptation with the active participation of senior management, including the Board of Directors,
- 4.3.** Will monitor climate change mitigation and adaptation through a collective perspective with working groups operating under the Sustainability Committee and consisting of employees from different disciplines,
- 4.4.** Will incorporate physical and transition risks arising from Climate Change into its own risk management system, ensure the analysis of risks and opportunities, and manage the results in the most appropriate manner,
- 4.5.** Will actively contribute to the United Nations Sustainable Development Goals (SDGs),
- 4.6.** Will establish targets for reducing greenhouse gas emissions and implement actions supporting these targets within the framework of the long-term goals of the Paris Agreement and the ISO 14001 Environmental Management System,
- 4.7.** Will calculate and verify annual greenhouse gas emissions in accordance with the ISO 14064 Greenhouse Gas Reporting and Verification Standard and continuously improve its performance,
- 4.8.** Commits to supporting the Task Force on Climate-Related Financial Disclosures (TCFD) and to conducting measurement and reporting accordingly,
- 4.9.** Commits to supporting the Task Force on Nature-Related Financial Disclosures (TNFD) and to conducting measurement and reporting accordingly.

DUTIES AND RESPONSIBILITIES

5.1. Board of Directors

The Board of Directors is responsible for the establishment, implementation, and updating of the Policy.

5.2. Sustainability Committee

5.2.1. The Sustainability Committee is responsible, on behalf of the Board of Directors, for ensuring the establishment, implementation, and updating of the Policy.

5.2.2. The Sustainability Committee is responsible for the management of climate change mitigation and adaptation processes.

6. EFFECTIVENESS

This Policy was approved and entered into force by the resolution of the Company's Board of Directors dated **02/04/2026** and numbered **2026/58**.

This Policy is binding for all projects and subsidiaries.

Together with its related procedures, it is reviewed when necessary, updated as required, and the relevant parties are informed accordingly.

7. REVIEW

This Policy is regularly reviewed by the Sustainability Committee in line with stakeholder opinions, TSRS (Turkish Sustainability Reporting Standards), all regulations published by the Ministry of Environment, Urbanization and Climate Change of the Republic of Türkiye, and developments in ISO 14001 standards.

8. RELATED POLICIES AND PROCEDURES

- Sustainability Policy
- Environmental Policy
- Biodiversity Policy
- Sustainable Supply Chain Management Policy