

OCCUPATIONAL HEALTH AND SAFETY POLICY

1. PURPOSE

The purpose of the Occupational Health and Safety Policy (hereinafter referred to as the “Policy”) is to protect the health and safety of the employees of Doğuş Construction and Trade Inc. (hereinafter referred to as the “Company”) and to minimize possible workplace accidents and occupational diseases. This Policy aims to adopt the provision of a healthy and safe working environment at every level of the Company as a fundamental priority and to support sustainable business practices.

2. DEFINITIONS

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

Occupational Health and Safety (OHS): Refers to all measures taken to protect and improve the physical, psychological, and social well-being of employees in the workplace and to prevent occupational accidents and occupational diseases.

ISO 45001: An international standard for Occupational Health and Safety (OHS) management systems. The purpose of this standard is to establish an effective OHS management system to prevent and improve injuries and health problems that may arise in working environments.

Risk Assessment: Refers to the process of identifying potential hazards in the workplace, analyzing the risks arising from these hazards, and determining the necessary control measures.

Hazard: Covers any situation or action related to work that has the potential to cause harm, injury, or health problems.

Risk: Refers to the probability arising from the combination of the likelihood of a hazard occurring and the magnitude of the damage or loss that may result from that hazard.

Emergency Plan: Refers to the plan that determines how the workplace will respond to events such as fire, earthquake, flood, and emergency health issues, what employees should do, and what measures will be taken.

3. SCOPE

This Policy covers:

a) The Company’s Board of Directors,

b) Company Employees,

c) Companies from which goods and services are procured and their employees,

d) 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 (“Business Partners”),
and their employees.

4. PRINCIPLES AND FUNDAMENTALS

With regard to occupational health and safety, the Company commits to:

4.1. Implementing its ISO 45001 Occupational Health and Safety System and ensuring the continuous improvement of our systems through periodic reviews and performance monitoring,

4.2. Complying with local and international legislative obligations,

4.3. Making the occupational health and safety culture a way of life,

4.4. Eliminating hazards that may arise as a result of our activities,

4.5. Providing a healthy and safe working environment by identifying in advance possible hazards and risks that may be encountered together with our employees and employee representatives,

4.6. Organizing awareness-raising trainings and seminars for our employees on professional matters and occupational health and safety issues,

4.7. Organizing training activities to ensure that our visitors, suppliers, and employees of service providers at every level comply with and effectively implement our OHS rules,

4.8. Continuously monitoring the compliance of our contractors and suppliers with our Occupational Health and Safety policies,

4.9. Taking corrective, preventive, and improvement actions with the goal of zero occupational accidents,

4.10. Ensuring continuous improvement in our occupational health and safety performance by following developments in the sector and worldwide with the support of our management,

4.11. Continuously improving all processes by reducing Occupational Health and Safety risks to an acceptable risk level,

4.12. Setting targets for the monitoring, measurement, and auditing of Occupational Health and Safety performance based on our sustainability goals, planning for these targets, and achieving the relevant targets,

4.13. Providing the information, human resources, technology, and financial resources required to ensure the continuity of the Occupational Health and Safety System,

4.14. Making the Occupational Health and Safety System accessible to the public and third parties.

5. DUTIES AND RESPONSIBILITIES

5.1. Board of Directors

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

5.2. HSE Department

5.2.1. The HSE Department is responsible, on behalf of the Board of Directors, for the establishment, implementation, and updating of the Policy.

5.2.2. The HSE Department is responsible for the effective execution and monitoring of the Company's occupational health and safety performance, targets, and projects developed to achieve these targets.

5.3. Employees

Employees are responsible for complying with the policies determined by the Board of Directors, working in compliance with internal and external legislation, and notifying the HSE Department in the event of encountering any behavior, attitude, transaction, action, decision, activity, or practice that is contrary to the Policy.

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7. 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 **2026/60**. It shall remain valid and in force until a new announcement is made.

8. REVIEW

This Policy is reviewed regularly once a year by the Sustainability Committee based on controls related to process or technical infrastructure changes. This reviewed and updated Policy is approved by the Board of Directors.

9. RELATED POLICIES AND PROCEDURES

- Occupational Health, Safety and Environmental Policy