

ECZACIBAŐI GROUP
ENVIRONMENT AND CLIMATE CHANGE POLICY

Prepared by	Sustainability, Corporate and Government Affairs
Approved by	Board of Directors of Eczacıbaşı Holding Co.
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1. PURPOSE AND SCOPE

“Respect for the individual, society and nature” is at the heart of Eczacıbaşı Group's¹ value creation process. Accordingly, Eczacıbaşı Holding Co. (Eczacıbaşı Holding) and Group companies believe it is their responsibility to support sustainable development and achieve business success through sustainable business models that increase the living standard of society and protect the environment.

Eczacıbaşı Group is a signatory to the United Nations (UN) Global Compact and strives to contribute to the UN Sustainable Development Goals (SDGs). Among the SDGs, the Eczacıbaşı Group’s priorities with respect to the environment and climate change are: SDG3-Good Health and Well-Being, SDG6- Clean Water and Sanitation, SDG7-Affordable and Clean Energy, SDG8-Decent Work and Economic Growth, SDG9- Industry, Innovation and Infrastructure, SDG10- Reduced Inequalities, SDG12- Responsible Consumption and Production, SDG13- Climate Action, and SDG17- Partnerships for the Goals.

The purpose of this Environment and Climate Change Policy (Policy) is to define the main principles of the Eczacıbaşı Group’s approach to managing environment-related risks and opportunities arising from the Group's activities, products and services, and set out its approach to informing stakeholders. The risk and opportunity topics covered by this policy are energy efficiency; renewable energy use; management of greenhouse gas emissions; water efficiency; circular economy; waste management, recycling and recovery; biodiversity; products and materials with low environmental impact, and access to green financing.

This Policy is binding for all activities and employees of the Eczacıbaşı Group. Group companies also ensure that the principles listed in this Policy are adopted by suppliers, subcontractors and business partners and disseminated throughout their operations.

¹ The “Eczacıbaşı Group” or the “Group” refers to Eczacıbaşı Holding Co. and all of the companies in which Eczacıbaşı Holding Co. directly or indirectly owns 50% or more of the share capital or has direct or indirect management control.

2. ENVIRONMENTAL AND CLIMATE CHANGE MANAGEMENT PRINCIPLES

The Eczacıbaşı Group encompasses many companies operating in diverse sectors and countries with an expansive ecosystem of suppliers, business partners, and millions of consumers around the world. For this reason, the Eczacıbaşı Group considers environmental and climate change impacts all along the value chain. These impacts can be grouped in three categories:

- Impacts Arising from Supply Chain Processes: Environmental and climate change impacts generated by products and services that Group companies purchase. Supplier operations, product and material preferences play a role in managing these impacts.
- Impacts Arising from Company Operations: Environmental and climate change impacts arising directly from the operations of Group companies.
- Impacts Arising from Products and Services: Environmental and climate change impacts that occur during the sale, consumption and end-of-life processes of goods and services produced by Group companies.

All Eczacıbaşı Group companies are expected to:

- Comply with national and international environment and climate change legislation and other requirements to which they are subject. In matters not covered by laws or regulations, Group companies are expected to adopt Group standards, internationally accepted principles, and best practices.
- Define their risks and opportunities related to the environment and climate change and apply them to their business strategies.
- Consider environmental impacts and climate change risks while making financial and physical investment decisions and carry out assessment studies accordingly.
- Prioritize the use of technologies that both facilitate the transition to a low carbon economy and take into account the dynamics of the sector in question, and undertake projects that help to combat climate change.
- Consider environmental and climate change impacts while designing plants and processes and choosing production technologies. Companies are expected to try to minimize their impact by implementing the best available techniques and technologies and integrating best practices into their business processes.
- Strive towards increasingly efficient energy use. Companies continually develop and implement projects to reduce energy intensity, losses, and leakages, and set targets for further improvements.
- Diversify their energy sources in light of climate change risks, and encourage the use of renewable energy.
- Aim to keep environmental and climate change impacts under control throughout product life cycles. Companies develop environment-friendly products and strive to improve their performance using the results obtained.
- Focus on reducing water use and water-related risks; increasing wastewater recovery; and taking environmental and social needs into consideration during water withdrawal.
- Identify risks related to soil degradation and take the required preventative measures.

- With a circular economy approach, support efforts to minimize resource use and packaging; use materials with low environmental impact; increase recycling, recovery, and reuse; and design products in accordance with this approach.
- Strive to prevent the generation of waste at its source, in line with the value chain approach. Wastes are reduced, separated, recovered, and, whenever possible, waste is treated as a resource.
- Participate in the efforts of customers in the value chain who want to measure the Group's performance with respect to the environment and climate change or collaborate on projects, and meet their demands accordingly.
- Consider climate change and environmental impacts in purchasing and procurement processes and supplier and raw material preferences. Companies also encourage their suppliers to develop products and practices for managing climate change and environmental risks.
- Monitor and manage operational performance related to the environment and climate change, set targets, and focus on continuous improvement. While setting targets, companies consider the Group's sustainability strategy and roadmap.
- Focus on protecting and improving natural ecosystems and reducing their impact on biodiversity in geographies where they operate.
- Determine noise and air emission risks and take related actions.
- Closely follow national and international developments with respect to the environment and climate change, communicate and collaborate on projects with institutions and organizations, support sectoral and public initiatives.
- Carry out training and communication activities to increase the awareness of employees, external stakeholders and society about the environment and climate change.
- Develop collaboration, joint projects, and studies with relevant stakeholders, especially business partners, suppliers, public institutions, national and international non-governmental organizations, professional associations and committees. Companies encourage business partners to improve their environmental performance.
- Monitor incentives that may be applied to both projects in development and new investments and prioritize green financing.
- Provide incentives for employees and business partners to improve their climate and environmental performance through suggestion and reward systems.

3. IMPLEMENTATION RESPONSIBILITY

This Policy was drawn up by the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs and entered into force following the ESG (Environmental, Social, Governance) Committee's favorable review and the Board of Directors' approval.

Top Management of each Group company is responsible for ensuring that the articles of this Policy are implemented in their company; each business unit within the company is responsible for implementation in their own areas of responsibility. Eczacıbaşı Holding's ESG Committee, Eczacıbaşı Holding Sustainability, Corporate and Government Affairs are responsible for monitoring the implementation of this Policy in Group companies.

The Board of Directors of each company may delegate their authority and responsibilities on environmental issues to persons they have authorized within the company in line with the procedures and principles of related legislation. In this case, the Board of Directors provides a high level of supervision and control over the person to whom responsibilities are delegated.

Eczacıbaşı Holding's Audit Group and affiliated internal audit departments also evaluate the implementation of this policy during the periodic audits they carry out in accordance with their annual audit program.

4. POLICY REVIEW

This Policy will be reviewed and evaluated annually by the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs. If a significant change in Eczacıbaşı Holding's practices affect the Policy, the Sustainability, Corporate and Government Affairs will review and adjust the Policy accordingly. Changes made to the Policy enter into force following the approval of the Board of Directors.

5. SUGGESTIONS AND COMPLAINTS

Requests for information, suggestions and complaints regarding the Policy can be shared anonymously through the VCO (Virtual Compliance Officer) notification channel (<https://eczacibasi.vco.ey.com/>) or sent to uyum@eczacibasi.com.tr via e-mail. The Eczacıbaşı Group Code of Conduct Manual states the actions to be taken in cases of behaviors and practices that violate this policy.

Employees or other stakeholders who make notifications and complaints in good faith regarding behaviors violating the norms of this Policy shall not be exposed to retaliatory behavior and attitudes.