

COMPANY: SÖĞÜT İNŞAAT A.Ş.

DOCUMENT NO: SGT-HSE-POL-001

DOCUMENT TITLE: OCCUPATIONAL HEALTH, SAFETY AND ENVIRONMENTAL POLICY

REVISION NO: 01

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1. INTRODUCTION AND SCOPE

Occupational Health, Safety, and Environment (HSE) is an integral component of construction project management at Söğüt İnşaat A.Ş. ("Söğüt İnşaat" or "Company") and is essential for protecting workers, minimizing operational risks, and ensuring compliance with applicable legal and contractual requirements.

Söğüt İnşaat construction activities inherently involve high-risk operations, including excavation works, lifting operations, work at height, electrical installations, confined spaces, and the use of heavy machinery. Therefore, a structured, proactive, and zero-tolerance HSE management system is essential throughout the project lifecycle. This Policy applies globally to all Söğüt İnşaat project sites, offices, employees, group members, and Third Parties (including suppliers, contractors, and subcontractors) acting on behalf of the Company.

The principles outlined in this Policy are fully compatible with ISO 45001:2018 Occupational Health and Safety Management Systems, ISO 14001 Environmental Management Systems, the IFC Environmental, Health, and Safety (EHS) Guidelines, the World Bank Environmental and Social Framework (ESF), and the occupational health and safety obligations incorporated into FIDIC Conditions of Contract.

2. GENERAL PRINCIPLES AND MANAGEMENT SYSTEM

Söğüt İnşaat Board of Directors is responsible for the oversight of this Policy, and the HSE Department, in collaboration with authorized Joint Health and Safety Units (OSGB) licensed by the Ministry of Labour and Social Security, is responsible for its implementation, execution, and continuous monitoring.

2.1 Occupational Health and Safety Management

Certified Occupational Safety Specialists and Workplace Physicians support the Company in

establishing, maintaining, and continually improving the project's Occupational Health and Safety Management System (OHSMS) by:

- Establishing project-specific OHS and environmental procedures.
- Monitoring compliance with statutory requirements, including the Turkish Occupational Health and Safety Law No. 6331.
- Advising project management on risk mitigation measures and supporting management during internal and external audits.

2.2 Hazard Identification and Risk Assessment

Risk assessment is a fundamental element of Söğüt İnşaat's preventive safety culture. HSE specialists participate in identifying workplace hazards, evaluating associated risks, and recommending appropriate control measures in accordance with the hierarchy of controls. Typical construction risks reviewed include excavation collapse, working at height, tower crane and mobile crane operations, temporary works, hot works, chemical exposure, noise, and traffic management. Risk assessments are reviewed periodically and updated whenever project conditions or construction methods change.

2.3 Development of Project-Specific HSE Documentation

Söğüt İnşaat maintains comprehensive documentation to provide the foundation for effective execution, including Project Health and Safety Plans, Environmental Management Plans, Risk Assessment Reports, Emergency Response Plans, Permit-to-Work Procedures, Incident Reporting Procedures, and Personal Protective Equipment (PPE) Management Procedures.

2.4 Occupational Health Services

Certified Workplace Physicians perform occupational health activities to secure workforce fitness and wellbeing, including pre-employment medical examinations, periodic health surveillance, fitness-for-work assessments, occupational disease monitoring, and health awareness campaigns.

2.5 Training and Competency Development

Söğüt İnşaat provides comprehensive HSE training programs designed to improve worker competence and strengthen the project's safety culture. These include project induction training, legal OHS awareness, high-risk work execution safety training (working at height, excavation, electrical, scaffolding safety), environmental awareness, and daily Toolbox Talks.

2.6 Workplace Monitoring, Safety Inspections, and Environmental

Care

Routine workplace inspections are conducted to verify compliance. These include daily safety observations, weekly/monthly inspections, scaffolding and lifting equipment inspections, temporary electrical installation checks, and PPE compliance monitoring. Concurrently, environmental monitoring is performed to minimize waste, manage spills, prevent pollution, and optimize resources.

2.7 Incident Investigation and Corrective Actions

Söğüt İnşaat adopts a strict "Zero Incidents" (Sıfır Kaza) performance target. In the event of occupational accidents, near-miss events, or dangerous occurrences, investigations are launched to identify root causes using recognized methodologies like Root Cause Analysis (RCA). Corrective and preventive actions are tracked, and lessons learned are communicated across all projects.

2.8 Emergency Preparedness and Response

Project-specific emergency preparedness systems are developed, comprising Emergency Response Plans, fire safety procedures, evacuation protocols, rescue plans for work at height or confined spaces, spill response procedures, and periodic emergency drills to ensure absolute readiness.

3. REPORTING OF VIOLATIONS

Any action or condition against this Policy, unsafe behaviors, or statutory non-compliance may jeopardize life and company reputation. All Employees and Third Parties are required to immediately report any actual or suspected violation or safety hazard through the following corporate channels:

- **Email:** etik@sogut-insaat.com.tr
- **Web:** sogut-insaat.com.tr/ethics
- **Ethics / HSE Hotline:** 0312 287 33 13

Söğüt İnşaat takes all safety and compliance reports seriously. All reports received are kept confidential unless there is a legal obligation to disclose them. Please refer to Söğüt İnşaat Whistleblowing Policy (SGT-KRY-POL-002) for details.

Ahmet KAPUSUZ

Company Manager / Őirket M¼d¼r¼