

GLOBAL INVESTMENT HOLDINGS

ENVIRONMENTAL POLICY

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V.2	June 2019

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1. PURPOSE AND SCOPE

INTRODUCTION AND PURPOSE

The purpose of this Environmental Policy ("Policy") is to explicitly state Global Yatırım Holding Anonim Şirketi ("GIH") and its affiliates (unless stated otherwise, "Company" covers GIH and all its affiliates (subsidiaries, jointly controlled entities and associates)) approach to environmental awareness and practices. With this Policy, our company aims to ensure compliance with environment-related laws and regulations, international regulations, and the legal regulations and ethical principles in the countries where it operates, as well as to determine relevant responsibilities and rules.

SCOPE

The Company expects all its affiliates and joint ventures to act in accordance with this Policy.

This Environmental Policy covers the following individuals and organizations:

- The Company's Board Members,
- Company executives and employees,
- The Company's subsidiaries, jointly controlled entities and affiliates including their employees,
- The third-party service provider companies, consultants, lawyers, persons and institutions working for or with the Company, including external auditors, contractors, agencies and similar parties.

2. DEFINITIONS

Following are brief definitions for the special terms, phrases, concepts and abbreviations used in this Environmental Policy:

GIH: Global Yatırım Holding Anonim Şirketi (Global Investment Holdings).

The Company: Global Investment Holdings and its affiliates (subsidiaries, associates, joint ventures having 50% or more share in the management)

Senior Management: The Company's Board Members and executives.

Employee: The Company's employees.

Service Provider: Companies (suppliers, subcontractors, clients etc.) offering services to the Company and/or receiving services from the Company including their employees.

3. RESPONSIBILITIES

Board of Directors

The Board of Directors is responsible for approving the Policy, along with supervising the determining and operating notifications, examinations, and enforcement mechanisms for non-compliance with rules and regulations.

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Senior Management

Senior Management is responsible for preparing, developing, executing and updating the Policy. It is accountable to the Board of Directors for creating, publishing, updating and abolishing the Policy when necessary.

Senior Management is also responsible for enforcing and auditing policy-related practices, as well as for taking necessary measures to ensure the compliance of employees and external service providers with this document, and reporting infractions to the Compliance and Internal Auditing Department for inspection.

Senior Management consists of the General Manager and Department Heads/Directors.

Sustainability Committee

The Sustainability Committee is responsible for fulfilling tasks specified in the documents, “Environmental Management System Procedures and Principles”, “Sustainability Management” and “Sustainability Committee Duties and Working Principles”.

Legal Department

The Legal Department evaluates the policy with regard to its relevance and areas requiring improvement, and submits suggestions to Senior Management.

Employee

Employees are responsible for:

- Adherence to and compliance with GIH policies, regulations and procedures,
- Working in compliance with the current legislation,
- Notifying the Compliance and Internal Audit Department in cases where conduct, activities or practices that are in breach of the Policy are encountered.

External Service Providers and Joint Ventures

It is mandatory for external service providers, suppliers and joint ventures to ensure compliance with the principles set out in this Environmental Policy, and other relevant regulations.

Corporate Communications Department

This Policy is published on the corporate portal. The Corporate Communications Department is responsible for its publication.

Human Resources Department

The Policy set out herein is distributed to the entire staff; the Human Resources Department is responsible for its distribution.

Investor Relations Department

The Investor Relations Department is responsible under this policy for the organization of the Company’s relationships with institutional investors, portfolio

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managers, analysts, and current and potential shareholders; and undertaking public disclosure practices for all interested parties in a simultaneous and transparent manner. The Investor Relations Department is responsible for publishing this Policy on the company website.

4. OUR COMMITMENTS

The Company:

- Carries out its port, energy, real estate, financial and other activities in accordance with the environmental legislations and international standards.
- Is committed to managing and reducing the environmental impacts of its business activities and continuously improving its environmental performance.
- Aims to reduce its greenhouse gas emissions to minimize its impact on climate change.
- Carries out activities to reduce its air emissions.
- Aims to lower the water consumption and use of natural resources while using them in the most efficient way in all its operations. We treat and discharge water emissions (wastewater) in accordance with legal obligations.
- Conducts activities to assess, reduce and recycle waste resulting from our activities at the source, and dispose of them as required by relevant legislation.
- Conducts activities to reduce energy use and increase energy efficiency in all stages of its operations.
- Aware of the importance of its stakeholders, adopts the principle of informing all stakeholders on our environmental policy, approach and performance through reports and announcements. We organize trainings to raise awareness among our employees and suppliers.
- Monitors and audits its environmental performance through the Environmental Management System. We continuously monitor our operations, identify areas for improvement, and set targets.
- To ensure stakeholder participation, the Company consistently enhances its environmental performance through feedback shared at annual meetings or current communication channels regarding environmental policy and activities.
 - Discloses its environmental performance on the website in an explicit and transparent manner.
 - Works in accordance with best practices in the industries in which the Company operates.

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5. NOTIFICATION OF NON-COMPLIANCE, FEEDBACK AND SUGGESTIONS

To communicate your reports, opinions and suggestions on this Environmental Policy, kindly email surdurulebilirlik@global.com.tr. You may also use the communication channels listed in the CONTACT POINTS section of this policy.

6. MONITORING, AUDIT AND IMPROVEMENT PROCESS

This Policy is regularly reviewed by the Corporate Governance Committee while the practices are continuously monitored, and relevant assessments are reported annually.

7. VALIDITY

This Policy was adopted by the Board of Directors resolution dated 29.06.2016 number 905.

8. CONTACT POINTS

Legal Department:

Uğur Aydın
Tel: 90(212) 244 60 00
E-Mail ugura@global.com.tr

Compliance and Internal Audit Department:

Mert Taşpolat
Tel: 90(212) 244 60 00
E-Mail mertt@global.com.tr

Human Resources Department:

Göknil Akça
Tel: 90(212) 244 60 00
E-Mail goknila@global.com.tr