

GLOBAL INVESTMENT HOLDINGS

ENVIRONMENTAL MANAGEMENT SYSTEM PROCEDURES AND PRINCIPLES

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GLOBAL INVESTMENT HOLDINGS INC.

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1. Goal and Scope

The Environmental Management System (EMS) Procedures and Principles are formed to define Global Yatırım Holding Anonim Şirketi's ("Global Investment Holdings" or "GIH") communication processes and practices regarding the Sustainability Committee ("Committee"), as well as to determine GIH's compliance with environmental law and obligations, environmental policy, objectives and targets, and to regulate the processes regarding, monitoring, auditing and reviewing these elements. The EMS document is intended to inform GIH stakeholders regarding the responsibilities, controls and activities with regard to environmental management.

GIH understands that the environmental management system and environmental performance of subsidiaries and associated partners can contribute positively to the company's value for stakeholders, in effective management of environmental and climate risks. Therefore, GIH aims to have these procedures and principles include sector-specific features and adjustments and act as a framework, especially for subsidiaries in which GIH owns the majority of shares or has management control.

2. Environmental Policy

The Committee prepares the environmental policy draft for improving GIH's value, industry competitiveness, environmental friendliness, reputation, and stakeholder communication, and presents it to the Board of Directors. The Environmental Policy is finalized and approved by the Board of Directors.

3. Environmental Dimensions

Environmental officers determine the dimensions and the impacts on the environment of GIH activities. They perform an environmental risk assessment according to actual and potential effects.

4. Legal and Other Conditions

GIH abides by all environmental laws, legal requirements and environmental commitments, as well as updates to environmental legislation.

5. Objectives and Targets

Environment officers determine the objectives and targets in consideration of the standards and regulations to be met, along with legal obligations, risk assessment, key environmental dimensions and environmental policy. These are then submitted to the Committee for approval and review.

The Committee reviews these objectives and targets and after approving them, establishes GIH's consolidated objectives and targets and submits these for Senior Management's review.

Environment officers monitor environment-related objectives and targets in their approved form.

GIH chooses suppliers carefully according to their environmental performance.

6. Training

The Committee determines where environmental training is required, and the Human Resources Department executes the training activities related to the environment. Environmental training programs consist of, at minimum, general environmental awareness, environmental policy, emergency management, management system requirements, and duties and responsibilities.

7. Communication

The GIH Environmental Policy, its environmental commitments, targets, objectives and performance, as well as its environmental activities are shared with all employees and stakeholders. In the case of emergencies, communication is determined by the Sustainability Committee with the approval of Senior Management.

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8. Documentation and Document Control

GIH Environmental Management Procedures, practices, controls, reviews and trainings are recorded as handbooks, forms, plans and lists. Documents are reviewed at least once per year and kept updated.

9. Operational Control

The Committee prepares and updates the control procedures regarding activities and processes that have significant environmental impact, determined by Environmental Policy and aligned with the objectives and targets. Environmental officers track compliance with procedures and record noncompliance.

10. Monitoring Environmental Performance

Environmental officers implement the monitoring and evaluation at the critical points of service processes and activities to ensure compliance with Environmental Policy, the environmental objectives and targets and pledged environmental commitments. They also track the performance and calibration of monitoring and evaluation tools, and record the results. Environmental performance results are reported to the Committee and Senior Management periodically and at least once per year.

11. Corrective and Preventive Actions

Environmental officers develop Corrective and Preventive Actions Procedures to record noncompliance, and determine the cause, with the aim of preventing repeated incidents. Environmental officers distribute reports on Corrective and Preventive Actions within GIH, with priority and/or urgent issues reported immediately, and others periodically and at least once per year, to Senior Management and the Committee.

12. Retention, Duration and Disposal of Records

All information and documents on the Environmental Management System are retained under suitable conditions for the specified time defined by the Legal Department in accordance with general and specific provisions of the legislation; unusable records and records that have exceeded the legal term limit are disposed accordingly.

13. Internal Audit and Review of Management

GIH employees are responsible for reporting processes and issues that are not compliant with the Environmental Management System, and/or the provision of work and environmental sustainability.

The Compliance and Internal Audit Department, within the Internal Audit processes, inspects procedures related to the Environmental Management System, and reports results to Senior Management and The Committee.

The Committee reviews reports from environmental officers and the Compliance and Internal Audit Department, determines environmental performance, and reviews the environmental policy and Environmental Management System. The Committee prepares reports regarding the environmental performance and reviews and submits these reports to Senior Management.

GIH Senior Management reviews the Environmental Management System at least once per year with regard to compliance, adequacy and effectiveness, based on reports from the environment officers, the Compliance and Internal Audit Department, and the Committee. The review results are submitted to the Board of Directors with the environmental performance report.

14. Enforcement

These Procedures and Principles have been approved and entered into force by the decision of the Board of Directors dated 29.06.2016 and numbered 905.