

TÜRK TELEKOM GROUP ENVIRONMENTAL POLICY

INTRODUCTION

This policy provides guidance for the development of Türk Telekom Group's environmental strategy across its operations and value chain. It has been prepared in accordance with the requirements of a circular economy and sustainable resource utilisation, with a commitment to ensuring compliance with all legal and other relevant obligations, while addressing climate change, energy and water efficiency, waste management, and pollution prevention. The Environmental Policy aligns with Environmental Law No. 2872 and the ISO 14001 Environmental Management System and is accessible to all stakeholders.

PURPOSE AND BASIS

The Türk Telekom Group Environmental Policy aims to support the Group's objectives in safeguarding natural resources, pursuing a journey toward net-zero emissions, minimising the environmental impact of its operations, promoting renewable energy production and use, and encouraging energy efficiency, while also taking into account the requirements of a circular economy. This policy contributes to green transformation and sustainable development. Türk Telekom Group intends to continuously improve this policy in line with its needs, while also aligning it with national and international developments.

SCOPE

This policy applies to all employees of Türk Telekom Group companies the suppliers and subcontractors that the Group cooperates with encompassing allworkplace activities and individuals (including customers and visitors) engaged in these operations enga. Subsidiaries of Türk Telekom Group develop their own policies and procedures in alignment with the Türk Telekom Group Environmental Policy.



COMMITMENTS

The principles adopted by the Türk Telekom Group to enhance its environmental performance throughout its entire value chain are as follows:

- a) Aim to ensure sustainability and reduce the carbon footprint across all operations and the value chain within the framework of the Türk Telekom Climate Change Action Plan.
- b) Aim to meet the requirements of national and international environmental legislation, as well as voluntary environmental initiatives.
- c) Implement and monitor environmental management systems that control, reduce, and/or eliminate the impacts of business activities on the environment, thus managing environmental risks.
- d) Define environmental targets in alignment to international standards and, in order to achieve these targets, apply the principles of environmental improvement to products and services through systematic monitoring and reporting of environmental performance, and follow the guidelines set forth in this policy.
- e) By embracing the core principles of circular economy, protect the environment through responsible and efficient use of resources, effective waste management, prevention of environmental pollution, promotion of eco-design, adoption of sustainable procurement practices, and the responsible positioning and management of the value chain.
- f) In line with a decarbonisation strategy, analyse transition risks, physical risks, and opportunities arising from climate change and incorporate these into the company's risk culture and management. Within this scope:
- measure and report, Türk Telekom Group's Scope 1, 2, and 3 emissions calculated from the 2020 baseline year on an annual basis.
- carry out activities aligned with Science-Based Targets (SBTi) for emissions reduction.
- develop energy efficiency and optimisation projects and invest in increasing the use of renewable energy.
- improve waste management and circular economy processes and implement innovative projects in these areas.



- ensure that the net-zero emission target is embraced at all levels, including all group companies and employees.
- g) aim to prevent potential land degradation resulting from our activities and ensure the sustainable management of impacts on biodiversity.
- h) ensure integrated management of water and reduce the water footprint across all business processes.
- i) encourage digital service and product innovation that contributes to the resolution of national and international environmental issues.
- j) provide training to employees, business partners, and customers on environmental impacts.
- k) incorporate environmental criteria—such as energy consumption and carbon emissions—into procurement processes in supplier chain management and purchasing activities.
- l) engage in communication and cooperation with relevant institutions and organisations in developing sustainability activities toward green transformation.
- m) disclose environmental performance to stakeholders through periodic reports based on the principle of transparency.
- n) aim to reward employees who contribute to improving environmental performance.

IMPLEMENTATION

Türk Telekom Group adopts international best practices as its guiding principles in addition to adhering to national regulatory requirements and the established environmental management system. The primary objective is to identify the environmental aspects and impacts of the company's activities, to control, reduce, and/or eliminate significant environmental impacts, to establish action plans for preventing environmental risks, and to undertake monitoring, measurement, remedial, and investment activities for controlling and mitigating these risks.

Emissions Management

- The Group intends to measure greenhouse gas emissions verified by independent firms on an annual basis and disclose related data in accordance with international reporting standards, in order to measure, monitor, and manage environmental impact.
- By developing products, projects, and smart solutions that contribute to managing the risks posed by the climate crisis, the goal is not only to reduce the Group's emissions but also to support the country's green transformation and decarbonisation strategy.
- The Group makes significant effort to diversify and expand projects aimed at reducing the use of fossil fuels and promoting environmental sustainability nationwide.



• Increasing investments in renewable energy systems is a key objective.

Energy Efficiency and Optimisation Measures

- The Group intends to continue energy savings through energy efficiency and optimisation projects carried out in its fixed and mobile networks.
- By replacing outdated cooling technologies in data centers with next-generation technologies and continuously improving PUE values, the aim is to achieve energy efficiency.

Circular Economy and Waste Management

- In accordance with the requirements of a circular economy, the aim is to support the management of hazardous and non-hazardous waste generated from office and field operations in line with the principle of recycling, and to separate all waste at its source to maximise the level of recycling, thereby contributing to the circular economy.
- The zero-waste principle is aimed to be extended to all areas of operation.
- Projects aimed at preventing waste, reducing it, reusing materials, and recycling are to be developed to encourage employee participation in these efforts and to raise environmental awareness.
- Establish partnerships to support electronic waste recycling, and organise waste collection campaigns.

Water Conservation

- The goal is to recycle and reuse water and to intensify water-saving measures, particularly in areas at risk of water stress.
- Eco-friendly applications such as smart irrigation systems, sensor-based faucets, and greywater systems are to be adopted for efficient water use.
- Building centralisation and area optimisation projects, along with projects such as rainwater recovery and misting systems, aim to reduce water consumption at data centres.



Biodiversity

• Within the scope of environmental impact assessment processes required by relevant legislation for our company's activities and investments, the aim is to preserve existing ecosystems, ensure their continuity, and prevent any short- or long-term adverse impacts on biodiversity, whether direct or indirect.

Supplier Management

- Control mechanisms that encourage the minimisation of environmental impacts are utilised in supplier evaluations.
- All procurement processes are conducted by taking into account environmental risks and the environmental impacts of the product or service to be acquired, starting from the preparation phase of the request.

REVIEW AND REVISION

The Türk Telekom Group Environmental Policy is reviewed and updated by the Sustainability Committee, under the leadership of the Investor Relations and Sustainability Directorate, in accordance with national and international requirements. The Türk Telekom Board of Directors assumes responsibility and oversight for the implementation of the Türk Telekom Group Environmental Policy. All stakeholders within the value chain, as well as those engaged in collaboration, are expected to act in compliance with the requirements of this policy. The Group takes incentivising measures to ensure such compliance.

ENFORCEMENT

The Türk Telekom Group Environmental Policy is to take effect following its approval by the Sustainability Committee and the Board of Directors.