



HEALTH, SAFETY, ENVIRONMENT AND QUALITY (HSEQ) POLICY

1. PURPOSE AND SCOPE

The main purpose of this HSEQ Policy ("Policy") is to develop a guideline that reflects our integrated approach and standards towards core HSEQ objectives as PENTHOL Group of Companies ("PENTHOL"), to emphasize our respect for human life, occupational safety principles and environmental protection, and to build a healthy environment-based approach with all stakeholders.

2. DEFINITIONS

"Business Partners" covers our suppliers, customers, contractors, all sorts of representatives, subcontractors and consultants, institutions/organizations with which we do business with including any other third parties.

"Regulatory Compliance" represents compliance with OHSAS 18001: 2007 Occupational Health and Safety Management System.

3. GENERAL PRINCIPLES

PENTHOL; employees, contractors, customers, stakeholders and society for the benefit of all its activities in an effective manner in terms of Health, Safety, Environment and Quality (HSEQ) management of the PENTHOL Code of Ethics.

All employees and managers of PENTHOL are obliged to act in accordance with this Policy, which is an integral part of PENTHOL Code of Conduct.

This policy has been prepared by taking into account PENTHOL's Main Shareholders' approaches to Compliance and their Code of Conduct and Values.

4. OUR COMMITMENTS

As PENTHOL, to achieve our goals with the Occupational Health and Safety and Environmental Strategies we have determined;

"Our Principle"

We will be primarily sensitive to human health, occupational safety and the environment in our activities,

"Leadership and Commitment"

We will ensure that our managers lead the fulfillment of the HSEQ Policy elements and that our employees and stakeholders demonstrate commitment to this policy.

"Regulatory Compliance"

We will fully comply with the applicable legislation, relevant standards and other conditions,

“Management of Risks (Threats and Opportunities)”

We will constantly evaluate the health, safety and environmental threats and opportunities that may arise during our activities in order to achieve zero accidents, and we will minimize the risks by taking preventive measures, and we will act on the basis of sustainability by taking human health, occupational safety and the environment into consideration in an integrated manner in all decision-making processes,

“Suitable Working Conditions”

We will provide working conditions in accordance with HSE standards to protect the health of our employees and prevent occupational diseases,

“Emergency Management”

We will be prepared to respond effectively in case of emergency,

“Environmental Management”

In order to minimize our environmental impact, we will use energy and natural resources efficiently, monitor our emissions and other environmental impacts and ensure the recycling of waste, effectively evaluate the life cycle approach, support sustainability, and provide the necessary human, financial and technological resources,

“Management of Change”

When changes arising from internal and external factors within the scope of our activities, we will take action by evaluating the threats and opportunities created by these changes in order to achieve the goals we have determined,

“Continuous Improvement”

In order to ensure continuous improvement in HSEQ and achieve our goals, we will monitor and audit the targets and performance indicators we have set, raise the awareness of our employees and contractors by providing training, make every effort to improve performance with the latest technologies in our work, and provide feedback to our employees, contractors and stakeholders in order to create a HSEQ Culture. We undertake to evaluate their suggestions and ensure their participation, create collaborations and share good practices.

5. TRAINING

We provide HSEQ training (through face-to-face or e-learning practices), which is available to all staff.

6. IMPLEMENTATION, REVIEW AND ENFORCEMENT

Our HSEQ Policy was approved by the General Manager on 30.11.2022 and entered into force.

Our HSEQ Committee shall examine this policy on a regular basis, taking into account the current requirements and changes to our operating conditions. After approval of our President on the basis of a recommendation by our HSEQ Committee, amendments

considered to be necessary shall take effect. In order to ensure that this Policy is observed and regularly followed-up on possible violations and suspicious situations identified as part of improvements, our President shall be in charge at the highest level.

Any employee who believes that there is a conflict between the language of the policy and our activities, has questions about this policy, or wishes to report a potential violation of this policy confidentially, can raise these concerns to the Human Resources Manager.

Criminal sanctions may be applied according to the provisions of regarding legislation if any violations or suspicious situation are detected that is contrary to the principles laid down in this Policy.

PENTHOL HSEQ Policy shall be made available to all our stakeholders, including employees, through our company website and intranet.