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		<b>Doc. Number</b>	<b>KG-POL1</b>
		<b>Published Date</b>	<b>30.06.2025</b>
		<b>Revision Number</b>	<b>01</b>
		<b>Revision Date</b>	<b>19.01.2026</b>

This Policy covers Summa Turizm Yatırımcılığı A.Ş. and all its group companies (“Summa” or “Summa Group Companies” or the “Company”). It is essential that Summa employees, managers, subcontractors, suppliers, business partners, and all third parties acting on behalf of or together with Summa comply with this Policy.

The purpose of this Policy is to set out Summa’s core principles and commitments in the field of sustainability and to establish the basis for managing the environmental, social and governance impacts of all company activities in an ethical, transparent and responsible manner.

Summa conducts all its activities in compliance with national and international environmental, social and governance (ESG) legislation, applicable industry practices, and global sustainability standards, including the International Finance Corporation (IFC) Performance Standards, Türkiye Sustainability Reporting Standard (TSRS), Global Reporting Initiative (GRI), International Organization for Standardization (ISO) 14001 and 45001, and the United Nations Global Compact (UNGC). Our Company adopts the highest ethical norms in the areas of resource efficiency, combating climate change, respect for human rights, occupational health and safety, and the provision of fair working conditions, and regards continuous improvement in these areas as a fundamental corporate value. For this reason, Summa will not, under any circumstances, tolerate violations of the sustainability provisions set out in this Policy.

Compliance with this Corporate Sustainability Policy is mandatory at all times for all employees and managers within Summa, as well as for all Third Parties acting on behalf of or together with Summa, including Summa’s group companies, affiliates, outsourced employees, subcontractors, suppliers, consultants, business partners, intermediaries and agents, external auditors and advisors.

All Summa employees and third parties shall make their best efforts to ensure full compliance with the provisions of this Policy. Summa will implement all necessary preventive and supervisory mechanisms to ensure that all personnel, agents, representatives and other persons engaged to act on behalf of Summa adhere to these provisions.

**In order to manage the environmental, social and governance impacts of company activities in an ethical, transparent and responsible manner, this Policy includes the following commitments:**

- We design all our investments and operations in alignment with the United Nations Sustainable Development Goals and the ten principles of the United Nations Global Compact; we set concrete indicators for each project and disclose the results in our annual reports.
- In order to protect our profitability, we regularly identify financial, sustainability and climate-related risks; we monitor the effectiveness of the measures taken and disclose developments in our Sustainability Report.
- We conduct all our business relationships in accordance with internationally recognised ethical standards; we investigate all allegations of misconduct, including conflict of interest, bribery and money laundering, through an independent Ethics Hotline and Whistleblowing Mechanism in full confidentiality, and apply deterrent sanctions for confirmed violations.
- We collect our ESG data using GRI- and TSRS-aligned indicators, subject these data to independent verification, disclose them to the public at regular intervals, and uphold a transparent and accountable reporting approach.
- We establish a Board-level “Sustainability, Ethics and Risk Committee” and report on the implementation of this Policy, performance indicators and improvement plans to the Board of Directors at least twice a year.
- We establish an Internal Control, Risk Management and Compliance (ICRM) system and regularly verify the effectiveness of our processes through internal audits.
- We implement our tax strategy in line with the principles of transparency, fairness and legal compliance; we declare in detail the taxes paid and incentives received in our publicly available reports.

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- We systematically integrate stakeholder engagement into our strategic decision-making processes and collect feedback through regular consultation meetings and surveys with key stakeholder groups.
- We adopt and develop innovative technologies that contribute to sustainable development and share our work on international platforms through active collaborations, thereby enhancing the capacity of our stakeholders.
- We openly communicate our corporate values and the impacts of our activities to all our stakeholders in a manner consistent with the principles of transparency and accountability.
- At every stage of our value chain, we focus on minimising the impacts of climate change, natural resource consumption, carbon and water footprints, and waste generation; we regularly review our process efficiency.
- We measure our corporate carbon footprint annually and set reduction targets.
- We systematically monitor our water consumption; we implement reduction plans in water-stressed regions and raise awareness on water efficiency among our employees and stakeholders.
- We implement practices that increase energy efficiency, expand the use of renewable energy sources, and ensure continuous improvement in our operations.
- We separate waste at source and adopt zero-waste practices; we dispose of hazardous waste in a manner that does not create adverse impacts on the environment and society, and we contribute to the circular use of natural resources.
- In our project areas, we protect biodiversity and cultural heritage and minimise adverse impacts through measures such as minimising land take, creating buffer zones and ensuring stakeholder engagement.
- We operate our ISO 14001-based environmental management system effectively; we monitor targets and indicators through periodic internal audits, verify them through independent certification processes, and foster a culture of continuous improvement across the Company.
- Acknowledging that our employees are our most valuable asset, we provide a working environment that fully complies with the core principles of the International Labour Organization (ILO) and national labour law, respects universal human rights, and is free from discrimination, while being equal and inclusive.
- In the field of occupational health and safety, we fully implement applicable legislation and international best practices, thereby making healthy, safe and fair working conditions for all our employees an indispensable part of our corporate culture.
- By ensuring that our suppliers and subcontractors act in line with our responsible supply chain approach, we minimise environmental and social risks throughout the supply chain and conduct our procurement processes in accordance with our defined management principles.
- In all regions where we operate, we promote local employment and prioritise the development of the local economy. We pursue our growth objectives in a way that supports the socio-economic development of society and reinforce this development through community investment projects in the fields of education, culture and arts, sports and conservation of natural assets.
- In our corporate social responsibility projects, we focus particularly on education, sports, culture and arts; we strengthen social benefit by implementing joint programmes with our stakeholders.
- In order to raise sustainability awareness among our employees, suppliers and customers, we develop comprehensive internal communication and training programmes and promote working principles that are in line with this Policy to enhance the sustainability performance of our operational stakeholders.

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The Sustainability Committee monitors the implementation of this Policy; reports performance indicators to the Board of Directors at least once a year; makes necessary revisions based on changes in legal regulations, business conditions or strategic priorities; and communicates updates to all stakeholders.

This Policy shall enter into force immediately upon its approval by the Board of Directors of Summa and its communication to Company management and employees via e-mail by the Health, Safety, Environment and Sustainability Officer, and upon its publication on Summa’s website for third parties such as business partners.

This Policy (hereinafter referred to as the “Corporate Sustainability Policy”) is an integral part of the “Summa Ethical Principles Policy” and embodies Summa’s sustainable growth approach, which is one of the fundamental elements of the Company’s long-term corporate strategy.

### Revision

<i>Rev. No.</i>	<i>Rationale for Revision</i>	<i>Revised by</i>	<i>Date</i>
01	Renaming of the department from HSE to Corporate Governance (KG).	Ezgi Bahar Köksel	14.01.2026

<b>Prepared by</b>	<b>Reviewed by</b>	<b>Approved by</b>	<b>Validity Date</b>
Environmental and Sustainability Chief	Group CEO	Board of Directors	19.01.2027