

1. PURPOSE

This policy, defining Doğuş Holding A.Ş.'s overall approach to energy management, has been prepared with the aim of enhancing its energy efficiency, reducing the environmental impact arising from energy consumption, lowering carbon emissions through reduced energy use, and establishing an energy management system aligned with the Company's sustainable growth objectives.

The policy is structured in accordance with the ISO 50001:2018 Energy Management Systems standard and Doğuş Holding's Decarbonization Strategy.

2. SCOPE

This policy covers all operational areas, buildings, and facilities owned by Doğuş Holding A.Ş. Through the policy energy management practices are recommended to be implemented and executed in line with its principles and with explicit reference to this policy, not only at the Company headquarters but also across the subsidiaries and affiliates of Doğuş Holding.

3. DEFINITIONS AND TERMS

Energy Management System (EMS): A management system established in compliance with ISO 50001:2018 Energy Management Systems standard to ensure the systematic improvement of energy performance.

Energy Performance: The overall measurable results related to efficiency, use, and consumption of energy.

Energy Efficiency: Refers to using less energy while maintaining the same level of production, service, or comfort.

Renewable Energy: Energy derived from naturally replenished sources such as solar, wind, biomass, hydroelectric, and geothermal power.

Energy Performance Indicators (EnPI): A quantitative indicator used to monitor, measure, and assess progress in energy performance.

Decarbonization: The strategic transformation process undertaken to reduce greenhouse gas emissions generated by an organization's operations, products, services, and value chain, to transition to low-carbon technologies, and ultimately achieve the long-term goal of net-zero emissions.

4. CORE PRINCIPLES

Doğuş Holding:

- Considers energy management as an integral component of environmental sustainability.

- Attaches importance to ensuring energy efficiency across all operations, prioritizing the use of renewable energy wherever possible, and reducing carbon emissions through various practices that promotes efficiency.
- Sets measurable targets to continuously improve its energy performance and ensures the regular monitoring and review of these targets.
- Commits to full compliance with ISO 50001 standard requirements and the national legislation on energy efficiency.
- Identifies its energy-related risks and opportunities and integrates them into strategic planning and investment decisions.
- Encourages the procurement of high-efficiency products, technologies, and services to reduce energy consumption.
- Conducts awareness-raising and training activities to promote energy consciousness among employees.
- Collaborates with all stakeholders on energy efficiency and supports the sharing of best practices

5. POLICY COMMITMENTS

- **Energy Performance Management**
Energy consumption data are regularly measured, monitored, and reported. Progress stages are evaluated through energy performance indicators (EnPI), and continuous improvement plans are developed accordingly.
- **Energy Efficiency and Technology Investments**
Existing processes are optimized to increase energy efficiency while environmentally friendly and low-energy-intensity technologies are prioritized in new investments.
- **Renewable Energy Use and Carbon Reduction**
Increasing the use of renewable energy sources, reducing the carbon footprint, and transitioning to a low-carbon energy portfolio in the long term are among the primary focus areas.
- **Legislative Compliance and International Standards**
All energy management activities are carried out in full compliance with the applicable national legislation, energy efficiency regulations, ISO 50001, and international sustainability standards.

- **Stakeholder Engagement and Transparency**

Energy management performance is shared transparently with the public and stakeholders through sustainability reports.

6. IMPLEMENTATION METHODS

- The Energy Management System in compliance with ISO 50001 is implemented across all facilities and regularly audited.
- Energy consumption data are monitored through digital systems and analyzed based on performance indicators.
- Action plans that suggest corrective and preventive measures are developed in response to identified deviations.
- Energy-efficient practices are disseminated across the Holding.

7. REPORTING AND MONITORING

Energy performance data are periodically analyzed, and annual performance reports are submitted to the Sustainability Committee. The results are disclosed in Doğuş Holding's Sustainability Report.

8. GOVERNANCE AND RESPONSIBILITIES

The Sustainability Committee, reporting to the Board of Directors of Doğuş Holding A.Ş., is responsible for the coordination of the Energy Management and Efficiency Policy. The boards of directors of subsidiaries and affiliates are responsible for ensuring the implementation of this policy within their respective companies. The contribution of senior management to energy performance is taken into consideration in annual performance evaluations.

9. TRAINING AND AWARENESS

Regular training programs are provided to all employees on energy saving, efficiency practices, and renewable energy use. The integration of energy awareness into the corporate culture is encouraged.

10. POLICY REVISIONS AND UPDATES

This policy is regularly reviewed by the Sustainability Committee in line with changes in national energy legislation and updates to the ISO 50001 standard.

11. ENFORCEMENT

This Policy was approved by the Board of Directors of Doğuş Holding on 05 August 2025 and publicly disclosed. It enters into force as of the date of its approval by the Board of

Directors of Doğuş Holding A.Ş. and is binding for all subsidiaries and affiliated companies. Together with its related procedures, it is reviewed when necessary, updated as required, and the relevant parties are duly informed accordingly.