

Aksa Enerji Üretim A.Ş

Environmental Management System Procedure and Framework

Environmental Management System Framework

1. Objective and Scope

So as to comply with environmental laws and other legal requirements and in order to form and sustain an efficient, shared and vital environment management system, this Environmental Management System Framework (EMSF) is issued within the Aksa Enerji Üretim A.Ş (Company), to specify the rules and authority related with the determination of environmental policy, its objective and targets and also execution, monitoring, audit and review of the environmental objective and targets.

Environmental Management Systems (EMS) may differ according to the production processes of the plants and the characteristic of their impact on the environment. This document specifies the minimal elements that should be present in each EMS.

The document specifies the current Environmental activities and its relation and correspondence with Sustainability Committee (Committee) and Sustainability Coordination Board (Board).

Another aim in issuing this document is to help Company stakeholders to obtain fast and ready information about activities, control, audit, responsibilities related to EMS implemented by the Company and the significant elements of the documentation used.

2. Environmental Policy

The Committee prepares Draft Environmental Policy of the Company by receiving the opinion of Production Units and the Board.

Draft Environmental Policy is finalized by the Board of Directors.

3. Determination of Environmental Aspects

The elements of Company activities, products or services that interact with the environment and any useful or harmful changes that partially or completely appear in the environment in connection with them are determined by the Board.

The Board performs risk assessment based on the environmental impact of environmental aspects and their realization probabilities.

4. Tracking Legal Terms and Other Requirements

The Board follows up the environmental regulations, standards or contractual terms, legal or non-legal, which the Company undertook to comply in countries operated, in national and local level, covering the activity, product and services of the Company and reports to the Committee and Production Units.

5. Determining Environmental Objectives and targets

The Board determines draft environmental objectives and targets in accordance with Environmental Policy, significant environmental aspects, risk assessments, regulations, standards and other conditions. The Board submits the draft environmental objectives and targets to the Committee both

on Production Unit basis and consolidated. Environmental objectives and targets of the Company are finalized with the approval of the General Manager.

6. Training

Human Resources perform training activities on environmental issues pursuant to the content approved by the committee. Environmental Training includes basically General Environmental Awareness, Environmental Policy, EMS Procedures, EMS Requirements, Importance of EMS, Emergency Situations, Duties and Responsibilities.

7. Communication

Internal and External Communication, including stakeholders, of the environmental policy, objectives and targets, plan and procedures, emergency situations, preparedness and response in accidents and emergencies, duties and responsibilities within EMS, realization of environmental objectives and targets, and Communication duties and authorized employees are determined by the Committee with the approval of General Manager.

8. Documentation and Review of documents

Environmental manual, EMS procedures, plans, forms and charts are prepared or made prepared by each Production Unit within the responsibility of Work Processes Department, in accordance with the company rules, purpose and objectives and put into effect by the approval of the General Manager.

All documentation is reviewed by Work Processes Department when necessary and at least once a year, the necessary changes are made and those that are invalid or out of date are terminated canceled.

9. Operational Control Procedures

Control Procedures for the operations and activities that have significant environmental impact are prepared or made prepared by Work Processes Department within the responsibility of Production Unit Manager and in accordance with the company rules, purpose and objectives. The control procedures are put into effect with the approval of the General Manager.

Environment Officers track whether Control Procedures are rigorously followed and non-compliances are recorded and reported to Production Unit Manager.

10. Environmental Performance Monitoring Procedure

Environmental Performance Monitoring Procedure is established by Work Procedures Department so as to monitor compliance to the Environmental Policy, objectives, targets, regulations, standards and conditions and for the monitoring and measurement at the critical points of activities, products and services and also for verification and calibration of measurement instruments. The procedure is put into effect by the approval of the General Manager.

Monitoring and measurements, verifications and calibration of measurement instruments are performed by Environment Officers and the results are recorded. Production Units report performance results to the Committee periodically.

11. Corrective and Preventive Activities Procedure

Work Processes Department establishes the Corrective and Preventive Activities Procedure so that production units and the employees can monitor and evaluate the occurrence of nonconformities, can eliminate them and prevent their reoccurrence in their environmental impact areas. The procedure is put into effect with the approval of the General Manager.

Nonconformities, corrective and preventive activities are recorded by Environment Officers using reports and/or forms within the responsibility of Production Unit Managers.

One copy of these reports and forms are sent to the Committee to transmit the information about the Corrective and Preventive Activities throughout the Company.

Production Units report Nonconformities, Corrective and Preventive Activities and their results to the Committee periodically.

12. Procedure For The Protection And Disposal Of Records

All documentation and information of environmental management system are preserved under appropriate conditions during the term determined by Work Processes Departments in accordance with the general and special provisions of the related regulations.

Overdue and expired records must be disposed appropriately.

The Procedure about the protection and disposal of records is established by Work Processes Department by taking the opinions of work units.

The procedure is put into effect with the approval of the General Manager.

Protection and disposal of the records are performed by Environment Officers within the responsibility of Production Unit Managers.

13. Audit and Review of Management

All Production Unit Managers, Environmental Officers and Employees are responsible for maintaining sustainability of our work and environment and also responsible for reporting incidents, events and processes, which are in nonconformity with the Environmental Management System.

Each Production Unit submits to the Committee its reports on the performance measurements of environmental objectives and targets, reports on their environmental implementations, and proposals and.

Work Processes Department supervises compliance to Environmental Management System and related procedures within Internal Audit processes. Besides the emergency cases, Work Processes Department, at least once a year, reports strengths and weaknesses of Environmental Management System including change proposals and audit results to the Committee and Board of Directors.

The Committee prepares a report to be submitted to the Board of Directors at least once in every calendar year, the report covers the implementation of objectives and targets of Environmental Management System, data related to the occurring events and losses, implementation of corrective activities, preventive measures and change proposals considered necessary in Environmental Management System.

The Board of Directors, taking the information and reports that are prepared by Production Units, Work Processes Department, and The Committee as a basis, assesses the realizations of the environmental objectives and targets. By taking the change proposals into consideration, The Board of Directors reviews the strategy, policy, objectives and targets.