SİNPAŞ GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş.

SUSTAINABILITY POLICY

1. PURPOSE

Sinpaş Gayrimenkul Yatırım Ortaklığı A.Ş. ("**Sinpaş GYO**" or the "**Company**") considers sustainability to be one of the key elements of its long-term value creation approach, corporate governance framework, strategic planning and risk management processes.

The purpose of this Sustainability Policy (the "**Policy**") is to set out the fundamental principles, approaches and priorities for addressing material environmental, social and governance matters that may arise from, or affect the Company through, its activities, projects and business relationships, from the perspective of **impacts, risks and opportunities**.

The Company supports the appropriate integration of material sustainability-related matters into its strategy, decision-making processes, risk management, project and investment assessments, financial resilience and long-term value creation approach.

In implementing this approach, applicable legislation and reporting requirements, the nature of the Company's activities and project portfolio, existing data infrastructure, technical and economic feasibility, financial resources, market conditions, technological developments and the expectations of relevant stakeholders are considered together.

2. SCOPE AND REPORTING BOUNDARY

This Policy sets out the overall sustainability framework of Sinpaş GYO covering:

- ✓ real estate investment and development activities,
- ✓ project development, design, construction, sales and related operating processes,
- ✓ employees,
- ✓ customer and investor relations,
- ✓ relationships with suppliers, contractors, subcontractors and other business partners,
- ✓ environmental and social impacts,
- ✓ corporate governance, ethics and compliance practices, and
- ✓ the management of sustainability-related risks and opportunities.

The inclusion of the Company's subsidiaries in sustainability management and reporting processes conducted at Group level is based on Sinpaş GYO's authority to control and direct such entities, the financial reporting scope and the sustainability reporting standards applicable in the relevant period.

The organisational and operational boundary of sustainability reporting is determined within the framework of the financial reporting and sustainability reporting standards in force for the relevant reporting period and the methodologies applied.

For value chain elements outside the Company's direct control, the extension of the principles set out in this Policy is addressed by taking into account the nature of the relationship, the level of risk and materiality, contractual possibilities and the Company's ability to exert influence.

3. CORE PRINCIPLES

Sinpaş GYO develops its sustainability approach within the framework of the following principles:

- ethical conduct,
- accountability,
- transparency,
- corporate governance,
- materiality,
- a risk-based approach,
- stakeholder engagement,
- prudence,
- environmental and social responsibility,
- data quality and traceability,
- continuous improvement, and
- long-term value creation.

The Company evaluates sustainability matters not only in terms of their impacts on the environment, the economy and people, but also in terms of the current or reasonably expected effects of such matters on the Company's strategy, business model, results of operations, financial position, cash flows, access to finance, cost of capital and long-term corporate resilience.

4. SUSTAINABILITY GOVERNANCE

At Sinpaş GYO, **ultimate oversight of material sustainability- and climate-related matters rests with the Board of Directors**.

The Board of Directors oversees the appropriate consideration of material sustainability- and climate-related risks and opportunities within the Company's overall strategy, investment and project decisions, risk management and long-term value creation approach.

The management and coordination of sustainability- and climate-related matters, and the monitoring of related performance, are carried out by the **Sustainability Committee** within the framework of the Company's current organisational structure and allocation of duties.

The Sustainability Committee operates, within the framework of its applicable duties, working procedures and principles, in relation to:

- developing sustainability approaches and policies,
- supporting the assessment of material sustainability-related risks and opportunities,
- monitoring relevant performance indicators,
- coordinating reporting processes,
- supporting information flows among relevant units, and
- presenting material developments to the Board of Directors.

The **Climate and Risk Committee** carries out activities within its own scope of duties and responsibilities to support the identification, assessment and monitoring of physical and transition risks arising from climate change and their integration into relevant decision-making processes.

The **Committee for Early Detection of Risk** fulfils, within the framework of its own working principles, its duties relating to the assessment, monitoring and reporting to the Board of Directors of material risks that may affect the Company's activities and continuity, including sustainability- and climate-related risks, as part of enterprise risk management.

The Company's other Board committees, executives and relevant units also contribute to the sustainability governance structure to the extent of their respective duties and responsibilities.

The governance structure described in this section may be changed in line with applicable legislation, the organisational structure, Board of Directors resolutions and the Company's needs.

5. ASSESSMENT OF MATERIALITY, IMPACTS, RISKS AND OPPORTUNITIES

Sinpaş GYO evaluates sustainability matters by taking into account the objectives and materiality approaches of different reporting frameworks.

In this context, the Company considers:

from a **TSRS perspective**, whether sustainability-related risks and opportunities could reasonably be expected to affect the Company's cash flows, access to finance, cost of capital, financial position, financial performance and corporate value over the short, medium and long term; and

from an **impact-focused sustainability reporting perspective**, the material positive and negative impacts that the Company has or may have on the economy, environment and people through its activities and business relationships, within the framework of appropriate methodologies.

When identifying material matters, the following may be considered, to the extent appropriate:

- ✓ the nature of projects and activities,
- ✓ geographical location,
- ✓ the value chain,
- ✓ stakeholder expectations,
- ✓ sectoral developments,
- ✓ the regulatory environment,
- ✓ financial materiality,
- ✓ the nature of environmental and social impacts, and
- ✓ likelihood of occurrence and potential magnitude.

Materiality assessments are reviewed when deemed necessary in light of changing conditions, new information, changes in the project portfolio and reporting requirements.

6. CLIMATE CHANGE AND CLIMATE RESILIENCE

Sinpaş GYO recognises that climate change may create physical risks, transition risks and opportunities for the real estate sector.

The Company monitors the objectives of the **Paris Agreement** and developments within the national implementation framework as part of its approach to addressing climate change and supporting the transition to a low-carbon economy, and takes such developments into consideration in its climate strategy and practices.

In line with the nature of its activities and project portfolio, the Company assesses, within a materiality framework, the potential effects of climate-related factors such as:

- extreme weather events,
- changes in temperature and precipitation patterns,
- water stress,
- changes in energy supply and energy costs,
- carbon and energy regulations,
- technological transformation,
- changing customer and investor expectations, and
- financing conditions.

The priority and nature of climate-related physical and transition risks may vary depending on the risk and materiality assessments carried out for the relevant reporting period.

In assessing the Company's climate resilience, appropriate **climate scenario analyses and other forward-looking assessment methods** are used, taking into account the requirements of applicable reporting standards, the nature of the risks to which the Company is exposed, and the reasonable and supportable information, capabilities and resources available to the Company at the relevant date.

The Company evaluates, within the framework of technical, operational and economic feasibility, options that may contribute to mitigating the impacts of material climate risks, enhancing adaptive capacity and assessing potential opportunities.

7. ENERGY AND GREENHOUSE GAS EMISSIONS

Sinpaş GYO recognises that energy use and greenhouse gas emissions may be among the material matters in terms of environmental performance and the management of climate-related risks.

Accordingly, the Company aims to:

- develop the data infrastructure for measuring and monitoring energy consumption,
- evaluate practices and technologies that may support energy efficiency,
- assess the technical and economic feasibility of renewable energy applications in suitable projects,
- improve the measurement, calculation and reporting processes for greenhouse gas emissions,
- evaluate operational and technological options that may contribute to reducing emissions, and
- improve the scope and data quality of emissions data over time.

Importance is placed on appropriately documenting the organisational boundary, emissions scopes, methodology, calculation methods, data sources, estimates and assumptions used in calculating and disclosing greenhouse gas emissions.

The Company's periodic targets relating to greenhouse gas emissions may be separately established within the scope of the relevant TSRS reports and/or other publicly available corporate disclosures.

8. WATER AND WATER SECURITY

Sinpaş GYO considers the protection of water resources and the efficient use of water to be among its material environmental matters, in light of the nature of its real estate activities and the geographical conditions in which its projects are located.

The Company aims to:

- ✓ develop measurement and data infrastructure relating to water consumption,
- ✓ evaluate practices that may contribute to improving water efficiency,
- ✓ take into account water stress and water access risks in line with project and location characteristics,
- ✓ assess basin-level risks and conditions to the extent appropriate,
- ✓ evaluate the technical and economic feasibility of rainwater, greywater and similar alternative water use and recovery practices, and
- ✓ monitor good practices that may contribute to reducing water-related environmental impacts.

The scope and methodology of water-related assessments may vary depending on the nature, location and development stage of the project, data availability and the materiality assessment for the relevant period.

9. NATURAL RESOURCES, MATERIAL USE, WASTE AND CIRCULARITY

Sinpaş GYO supports the responsible and efficient use of natural resources.

Within the framework of the nature of its activities and feasibility, the Company aims to:

- ✓ improve resource and material efficiency,
- ✓ evaluate practices aimed at preventing or reducing waste generation,
- ✓ evaluate opportunities for the reuse, recycling or recovery of suitable waste,
- ✓ manage waste in accordance with applicable legislation, and
- ✓ evaluate areas in which circularity approaches may be applied in project development and operational processes.

Decisions relating to material and resource use are made by considering factors such as quality, safety, technical requirements, cost, legislation, environmental impacts, supply conditions and feasibility together.

10. BIODIVERSITY, ECOSYSTEMS AND LAND USE

Sinpaş GYO takes into account that real estate development activities may have direct or indirect impacts on land use, ecosystems and biodiversity depending on the location, nature and scale of a project.

Within the framework of applicable legislation, project characteristics and materiality, the Company aims to:

- ✓ assess potential impacts associated with sensitive natural areas and ecosystems,
- ✓ comply with environmental permits and other legal obligations,
- ✓ evaluate practices that may contribute to preventing or reducing material environmental impacts, and
- ✓ take landscape, green space and ecosystem characteristics into account in project planning to the extent appropriate.

The scope of biodiversity- and ecosystem-related assessments is determined in line with the location, nature and development stage of each project and the applicable regulatory obligations.

11. SUSTAINABLE DESIGN, CONSTRUCTION AND CLIMATE ADAPTATION

Sinpaş GYO attaches importance to evaluating design and technology options that may support quality of life, resilience, resource efficiency and environmental performance in the projects it develops.

In this context, the following may be evaluated within the framework of the nature and location of the project, user requirements, technical requirements and economic feasibility:

- ✓ energy and water efficiency,
- ✓ utilisation of natural light and ventilation,
- ✓ appropriate material selection,
- ✓ climate and disaster resilience,
- ✓ waste management,
- ✓ environmentally sensitive landscaping practices,
- ✓ user health, safety and comfort,
- ✓ smart building and digital technologies,
- ✓ renewable energy, and
- ✓ design options for climate adaptation.

National or international green building standards, certification systems and sectoral good practices may be considered as references, depending on project characteristics and feasibility.

This Policy does not constitute a commitment that all of the Company's existing or future projects will obtain a specific green building certification.

12. HUMAN RIGHTS AND WORKING LIFE

Sinpaş GYO considers respect for human rights and fair working conditions to be among the key elements of its corporate approach.

The Company adopts the following principles:

- ✓ respect for human rights in its own operations,
- ✓ prevention of discrimination in working life and support for equal opportunities,
- ✓ respect for employees' rights arising from legislation and contracts,
- ✓ prohibition of forced labour and child labour,
- ✓ promotion of training and development opportunities that may support the development of employees' professional knowledge, skills and competencies, and
- ✓ consideration of employee views and feedback through appropriate channels.

The extension of expectations relating to human rights and working conditions across supplier, contractor and other business relationships is addressed within the framework of the nature of the relationship, the Company's ability to influence the relevant party, the level of risk, contractual possibilities and feasibility. Detailed principles and practices relating to human rights and working life may also be set out in the Company's relevant policies, procedures and internal regulations.

13. OCCUPATIONAL HEALTH AND SAFETY

Sinpaş GYO considers the protection of the health and safety of its employees and other persons associated with its activities to be one of the fundamental elements of its operations.

The Company adopts the following principles:

- ✓ identification and assessment of occupational health and safety risks,
- ✓ implementation of necessary measures to prevent or reduce risks,
- ✓ enhancement of employees' occupational health and safety awareness,
- ✓ monitoring and assessment of incidents, accidents and non-conformities within the relevant processes, and
- ✓ observance of applicable legislation and relevant contractual obligations in activities carried out with contractors and subcontractors.

Occupational health and safety practices are assessed in line with applicable legislation and the risk profile of the activities and are further developed as needed.

14. STAKEHOLDER ENGAGEMENT AND SOCIAL IMPACT

Sinpaş GYO takes into account that its activities may have economic, environmental and social impacts on different stakeholder groups.

The Company supports:

- ✓ identification of material stakeholder groups,
- ✓ use of appropriate communication and feedback channels,
- ✓ consideration of material stakeholder views,
- ✓ consideration of the material impacts of activities on local communities, and
- ✓ evaluation of social contribution initiatives in areas deemed appropriate.

The method, frequency and scope of stakeholder engagement may vary depending on the nature of the matter, its level of materiality and the relevant stakeholder group.

15. CUSTOMERS, PRODUCT QUALITY AND QUALITY OF LIFE

Sinpaş GYO considers understanding customer needs and expectations, improving product and service quality, and supporting practices that enhance users' quality of life to be among the key elements of long-term value creation.

The Company adopts the following principles:

- consideration of customer opinions and feedback,
- support for efforts to improve product and service quality,
- consideration of user health, safety and comfort within the scope of project characteristics, and
- compliance with obligations relating to the confidentiality of customer information and the protection of personal data.

16. SUPPLY CHAIN AND BUSINESS PARTNERS

Sinpaş GYO takes into account that part of its environmental and social impacts may be associated with suppliers, contractors, subcontractors and other business partners.

Accordingly, within the framework of materiality, risk and ability to exert influence, the Company encourages its fundamental expectations in the following areas to be reflected in relevant business relationships through appropriate methods:

- compliance with legislation,
- ethical business conduct,
- environmental responsibility,
- human rights and working conditions, and
- occupational health and safety.

The sustainability approach relating to the supply chain may be developed progressively by taking into account the nature of the supplier or business partner, the scope of the relationship, the level of risk and materiality, contractual possibilities, existing data infrastructure and the Company's ability to exert influence.

This Policy does not constitute an absolute guarantee of compliance or outcomes in respect of all activities of suppliers, contractors, subcontractors or other business partners outside the Company's direct control.

17. BUSINESS ETHICS, COMPLIANCE AND CORPORATE GOVERNANCE

Sinpaş GYO considers ethical and responsible business conduct to be one of the key elements of sustainable corporate success.

The Company supports:

- compliance with applicable legislation,
- observance of ethical business principles,
- development of appropriate control mechanisms for preventing and managing bribery and corruption risks,
- management of conflicts of interest through appropriate methods,
- observance of fair competition principles,
- transparency and accountability,
- availability, and development as needed, of appropriate channels that enable the reporting of breaches of ethical principles or legislation,
- protection of personal data, and
- observance of obligations relating to information security.

18. SUSTAINABILITY-RELATED FINANCIAL EFFECTS AND LONG-TERM VALUE CREATION

Sinpaş GYO takes into account that sustainability-related risks and opportunities may affect the Company's economic and financial resilience.

To the extent appropriate, the Company aims to take into account the following in material investment, project, strategy and financing assessments:

- ✓ material sustainability-related risks and opportunities,
- ✓ resource and energy efficiency,
- ✓ resilience of assets to climate and other sustainability risks,
- ✓ regulatory developments,
- ✓ technological changes,
- ✓ market and financing conditions, and
- ✓ sustainability information expectations of investors and financial institutions.

Sustainable financing instruments and related market practices may be evaluated within the framework of financial discipline, market conditions, cost-benefit assessment and feasibility.

19. METRICS, PERFORMANCE INDICATORS AND TARGETS

Sinpaş GYO recognises that measuring and monitoring performance relating to material sustainability and climate matters through appropriate metrics and indicators contributes to the development of sustainability management.

Accordingly, the Company aims to:

- ✓ identify appropriate performance indicators for material sustainability matters,
- ✓ improve data collection, calculation, consolidation and control processes,
- ✓ monitor performance periodically, and
- ✓ establish qualitative and/or quantitative targets and related actions in areas where deemed necessary and appropriate.

When establishing performance indicators and targets, the following are taken into account:

- ✓ relevant reporting standards,
- ✓ data availability and data quality,
- ✓ current performance level,
- ✓ technical and economic feasibility,
- ✓ project and investment portfolio,
- ✓ investment requirements,
- ✓ regulatory developments,
- ✓ technological developments, and
- ✓ market conditions.

Periodic qualitative and/or quantitative targets established and publicly disclosed by the Company under TSRS or in other corporate reports and disclosures are monitored within the framework of their respective scope, base year, time horizon, methodology, assumptions and review principles.

Performance against such targets is monitored within the relevant management processes and disclosed publicly in accordance with applicable reporting requirements.

Targets may be reviewed when deemed necessary in light of new information, improvements in data quality, actual performance, the project portfolio, technical or economic conditions and regulatory developments, without prejudice to the relevant disclosure obligations.

This Policy itself does not constitute a standalone quantitative commitment to achieve a specific level of performance or a specific numerical outcome by a specific date.

20. REPORTING, DATA QUALITY AND TRANSPARENCY

Sinpaş GYO attaches importance to enhancing the **fair presentation, comparability, verifiability, timeliness and understandability** of sustainability information for investors and other users of reports.

Within the framework of the legislation and reporting obligations to which it is subject, the Company publicly discloses material sustainability and climate information through corporate reports, its website, the Public Disclosure Platform and/or other appropriate communication channels.

In sustainability reporting processes, consideration may be given, to the extent applicable and relevant to the Company, primarily to the **Turkish Sustainability Reporting Standards (TSRS 1 and TSRS 2)** in force, as well as to:

- ✓ GRI Standards [**Global Reporting Initiative**],
- ✓ relevant sectoral sustainability indicators and guidance,
- ✓ the CDP environmental disclosure approach [**Carbon Disclosure Project]**,
- ✓ capital markets sustainability regulations, and
- ✓ public data expectations of investors and ESG data providers.

The consideration of these frameworks within the Policy does not mean that the Company fully complies with all criteria of each framework or guarantees any particular external rating outcome.

The Company supports the appropriate documentation and the development of data management processes in relation to the following elements used in preparing sustainability information:

- ✓ reporting and organisational boundaries,
- ✓ methodologies,
- ✓ calculation methods,
- ✓ data sources,
- ✓ estimates,
- ✓ assumptions, and
- ✓ material methodological changes.

Importance is placed on maintaining consistency between information disclosed in financial and sustainability reports in terms of the relevant period, scope, unit, methodology and the distinction between actual and targeted performance.

For information subject to independent assurance, the applicable legislation, assurance standards and the scope of the independent assurance report are taken as the basis.

21. INVESTOR RELATIONS AND CAPITAL MARKETS TRANSPARENCY

Sinpaş GYO takes into account the increasing importance of sustainability-related financial information for investment decisions and capital markets.

In its communications with investors and capital market participants, the Company attaches importance to presenting sustainability information in a manner that is:

- ✓ clear,
- ✓ balanced,
- ✓ understandable,
- ✓ consistent,
- ✓ verifiable, and
- ✓ comparable to the extent possible.

The Company supports strengthening the connections between financial reporting and sustainability reporting and evaluating material sustainability risks and opportunities together with the Company's strategy, business model and financial effects.

The Company takes care to ensure that public sustainability disclosures are based on available data and reasonable and supportable information and assumptions as of the reporting date, and to avoid misleading, exaggerated, unsupported or absolute environmental and social claims.

22. INNOVATION, DIGITALISATION AND CONTINUOUS IMPROVEMENT

Sinpaş GYO considers that technology and innovation may contribute to improving resource efficiency, environmental performance, user experience, data quality and corporate resilience.

In this context, the Company may monitor and evaluate, within the framework of technical and economic feasibility:

- ✓ systems that support the measurement and efficient use of energy and water,
- ✓ digital solutions that may facilitate the collection, control and management of sustainability data,
- ✓ smart building technologies,
- ✓ designs and practices that may support resource efficiency, and
- ✓ emerging technologies in the sector.

The Company treats sustainability management as a continuously evolving process in line with changing legislation, reporting standards, technological developments, market conditions, data infrastructure and stakeholder expectations.

23. NATURE OF THE POLICY AND FORWARD-LOOKING STATEMENTS

This Policy constitutes a general corporate framework setting out Sinpaş GYO's fundamental approach, principles and priorities in the area of sustainability.

The objectives, approaches and priorities set out in the Policy are implemented by taking into account applicable legislation, applicable reporting standards, the nature of the Company's activities and project portfolio, data availability and quality, technical and economic feasibility, investment needs, market conditions and developments in the field of sustainability.

The Company's specific performance indicators, targets, base years, methodologies and implementation plans for particular reporting periods may be separately established in the relevant TSRS reports, sustainability reports, other corporate disclosures or internal management processes.

This Policy does not invalidate or supersede such periodic and publicly disclosed targets.

Forward-looking statements contained in the Policy are based on the information, conditions, assumptions and expectations available as of the relevant date. The relevant approaches and practices may be reviewed in light of future changes in legislation, market conditions, economic conditions, the project portfolio, data quality, technology or other circumstances.

The Company's legal and public disclosure obligations are reserved.

24. IMPLEMENTATION, REVIEW AND EFFECTIVE DATE OF THE POLICY

The principles set out in this Policy are reflected in the Company's activities to the extent appropriate by the relevant management units and employees within the framework of their respective duties and responsibilities.

Implementation of the Policy is supported by the Company's other relevant policies, procedures, terms of reference and working principles, and internal control and risk management processes.

The Sustainability Committee is responsible for administering the Policy, monitoring its implementation and coordinating necessary update activities.

The Policy is reviewed when deemed necessary, taking into account:

- ✓ changes in legislation and regulations,
- ✓ developments in the Turkish Sustainability Reporting Standards and other relevant reporting frameworks,
- ✓ changes in the Company's strategy and activities,
- ✓ changes in material sustainability- and climate-related risks and opportunities,
- ✓ developments in the project portfolio,
- ✓ stakeholder and capital market expectations, and
- ✓ corporate needs.

This Policy and any material amendments to its fundamental principles enter into force upon approval by the Board of Directors of Sinpaş Gayrimenkul Yatırım Ortaklığı A.Ş.

Sinpaş GYO adopts the responsible management of its environmental and social impacts, the assessment of material sustainability- and climate-related risks and opportunities, the enhancement of corporate governance and data quality, and the support of long-term corporate resilience as part of its sustainable value creation approach.

Prepared by: Sustainability Committee / Climate and Risk Committee **Approved by:** Board of Directors