GENERAL ENVIRONMENT PROCEDURE

1. OBJECTIVE:

To define the general conditions for operations carried out at Aydem Renewables and interact with the environment.

2. SCOPE:

It covers all operational processes and renewable energy plants of Aydem Renewables.

3. RESPONSIBILITIES:

The Environmental Department employees, Process Owners, Process Supervisors, Plant Managers, Administrative Affairs Officers, and all employees are responsible for the implementation of this procedure.

4. DEFINITIONS:

- **Receiving Environment:** is the environment such as lakes, streams, coastal, marine waters and ground water where waste water is discharged or indirectly flows into such.
- **Packaging:** are the products made of any material, non-recyclable and used for raw materials, processed goods, transportation, protection, storage and sale of a product from the manufacturer to the consumers within the framework of the criteria included in Annex-1
- **Analysis Firms:** These are institutions and organizations that have received a competency certificate from the Ministry of Environment, Urbanization, and Climate Change.
- **Waste Oil:** Oil products used in gasoline engine, diesel engine, gearbox and differential, transmission, grease and other special vehicle oils and hydraulic system, turbine and compressor, skid, open-closed gear, circulation, metal cutting and processing, metal drawing, textile, heat treatment, heat transfer, insulation and protector, insulation, transformer, mold, steam cylinder, pneumatic system protector, food and pharmaceutical industry, paper machine, bearing and other special industrial oils and industrial greases, used thickener, protective oils, cleaner and similar preparations and oil products that are not suitable for use.
- **Waste:** It is defined as solid, liquid or gaseous substances generated at the end of all production and consumption activities that may cause indirect or direct damage and affect the potential of the environment by changing the natural composition and properties of the receiving environments that they contaminate with their physical, chemical and bacteriological properties
    - **Waste water:** Domestic wastewater from the waters used to meet the daily needs of the plant
- **Disposal:** It means all processes including composting, incineration to save energy and/or carry out sanitary landfill and contribute to the economy after temporary storage of solid wastes in places such as houses and workplaces where they are produced; collection, transportation, and recovery from these places.
- **Waste Vegetable Oil:** Used frying oils, oils from oil retainers of various plants and vegetable oils whose use date is expired.
- **Environmental Consultancy Firms:** These are the organizations that procure services on environmental management and obtain environmental permits, licenses and qualifications.
- **Environmental Officer:** The person who is responsible for necessary permits, licences and notifications of all businesses related to the environment to the Ministry according to the environmental legislation and cause the necessary arrangements to be made is called the environmental officer.
- **Environment Folder:** It is the folder where received documents of all works related to environmental legislation and records are kept separately.

- **Domestic wastewater:** Wastewater originating from residential areas and service sectors such as schools, hospitals and hotels, where mostly domestic activities and people's daily life activities take place.
- **Filter:** These are air or oil filters removed from the used construction machinery or vehicles that provide transportation to the site and have completed their economic life.
- **Temporary Waste Storage Area (TWSA):** It is the area within the facility of the manufacturer or if there is no suitable place within the facility, an suitable area, where the waste is safely stored by the waste producer before it is transported to the intermediate storage, recycling and final disposal facilities or used again at the facility
- **Temporary Site:** These are places where mechanical or structural / construction maintenance is performed in any structure of the power plant (Regulator, Transmission channel / tunnel, loading pool etc.).
- **Contaminated Waste:** Oily and painted cotton waste, etc. cloths, packages that interact with hazardous waste, etc.
- **Negativity:** These are unfavorable developments that occur when an operation or service fails to meet pre-determined conditions.
- **End-of-life Tires (ELT):** These are the original or coated tires but removed from the vehicle as they cannot be used as a tire on the vehicle after they are found to have completed their useful life
- **Hazardous Waste:** Waste marked with letter (A) in the Annex IV-of the Management Regulation.
- **Non-hazardous waste:** Waste not falling under the definition of hazardous waste.
- **Medical Waste:** Infectious waste, pathological waste and sharp object waste.

5. IMPLEMENTATION:

5.1. Environmental Aspects and Impact Assessment

Defining the environmental aspects that may occur in the head office and power plants of Aydem Renewables, evaluating the impact size, and periodically reviewing the assessments are carried out as specified in the ***"Environmental Impact Assessment Procedure (CVR.PRS.001)".***

5.2. Assessment of Compliance with Legal Requirements

Assessment of compliance with legal and other requirements regarding Environmental Management Systems in Aydem Renewables, is carried out as specified in "***Procedure for Assessment of Conformity (KYS.PRS.006)"***.

5.3. Assessment Environmental Status

By the HSE and Sustainability Manager, HSE and Sustainability Specialist, or HSE and Sustainability Specialist Assistant;

- The amount of hazardous waste generated per unit MWh of electricity produced (annually),
- The amount of recyclable waste generated per person (annually),
- The amount of greenhouse gases per unit MWh of electricity produced (annually),
- The amount of water consumed per person (annually),
- The amount of water withdrawal per unit MWh of electricity produced (annually),
- The number of environmental complaints (annually)

are calculated and recorded in the '**Environmental Status Monitoring Form (CVR.FRM.009)**'.

Plant Supervisors and Administrative Affairs Supervisor will record**,**

- Electricity Generation (MWh) (monthly)
- Electricity Consumption (MWh) (monthly)
- Natural Gas (m^3) (monthly)
- Diesel (lt) (monthly)
- Other Fuel (lt) (monthly)
- Cooling water (m^3) (monthly)

- Drinking water (m^3) (monthly)
- Utility water (m^3) (monthly)

It is recorded in the '**Monthly Consumption Tracking Table (CVR.FRM.012)**'.

Energy Management Officer will calculate;

- Electricity Consumption (in TEP-Tons of Oil equivalent) (monthly)
- Natural Gas Consumption (in TEP-Tons of Oil equivalent) (monthly)
- Diesel Consumption (monthly),
- LPG Consumption (monthly),
- Gasoline Consumption (monthly),

is calculated and recorded in the '**Energy Users Form (ENY.FRM.001).**'
The results are reported to the General Manager and the HSE and Sustainability Manager.

5.4. Environmental Targets and Performance Indicators

Environmental targets of Aydem Renewables are set by the General Manager and Environmental Relations Manager by taking into consideration the results of environmental impact assessment, compliance with legal and other requirements, and are defined in "***Targets and Performance Indicators (KYS.FRM.004)" and*** monitored and shared with the QDMS document management module.
Planning is performed at YGG meetings and recorded in the ***"Environmental Targets Planning Form (KYS.FRM.012)"***

5.5. Communication

Internal and external communication methods on environmental issues are provided by OHS, Environment and IMS Manager, Environmental Relations Manager, Environmental Relations Specialist and Information Technology Process Owner.

Internal communication ways at AYDEM YENİLEBİLİR ENERJİ A.Ş.;

- Telephone,
- Web page,
- Radio,
- E-mail,
- QDMS Software,
- Common Network,
- Management Review Meetings,
- Bulletin boards
- Trainings
- EnPort
- IEIS (Integrated Environmental Information System)

External Communication Methods of Aydem Renewables;

- Environmental aspect and environmental impact assessments, and compliance with legal and other requirements are the responsibility of the 'Environmental Department.'
- Activities within the scope of emergency situations are the responsibility of the 'Environmental Department.'
- Communication with legal institutions, periodic correspondence, and reporting are the responsibility of the 'Environmental Department.'
- Reviewing policies and objectives is the responsibility of the 'General Manager, HSE and Sustainability

Manager, and Sustainability and QMS Manager.'

- In the event of any feedback (suggestions, warnings, complaints, etc.) from relevant parties (third parties), it is the responsibility of the 'Operations Managers and Environmental Department.'
- Communication, periodic correspondence, and reporting with waste management and analysis service providers are the responsibility of the 'Environmental Department.

5.6. Complaints

Any complaints from related parties (neighbors, non-governmental organizations etc.) or governmental agencies environment are recorded in or ***"Related Party Complaint Monitoring Form (KYS.FRM.013)"*** by the Sustainability and IMS Manager is informed. By inquiring the main causes of the complaints, actions to prevent the recurrence of the complaint are carried out according to the ***"Corrective Action Procedure (KYS.PRS.003)".***

5.7. Water Pollution Management

- The domestic wastewater of construction sites and facilities with a population of less than 2000 people is collected in a leak-proof septic tank to be built in accordance with the provisions of the Regulation on Septic Tanks to be built in places where sewage system is not available, published in the Official Gazette, dated 19/3/1971 and numbered 13783 and directed to wastewater facilities via sewage truck in agreement with the nearest municipality
- Calculation for a septic tank is made according to the formula below.
  If it is assumed that the average per capita wastewater generation is 217 lt / day (TUIK and provincial bank data) in a facility where a total of 12 people working in double shifts per day (taken as 6 people per day),
  Total 6 * 217 lt / day = 1.302 m3/day waste water is generated daily.
  The volume of the septic tanks must be calculated depending on how often the septic tank is emptied; 1.302 m3 / day * 30 days = 39.06 m3.
- The wastewater sources that collect the domestic wastewater in a leak-proof cesspool and deliver it to the wastewater infrastructure facilities via the sewage truck must keep the protocol they have obtained with the Waste Water Management and the documents they have as a result of the wastewater disposal with the sewage truck and declare them to the officers during the inspections.
- It is necessary to establish domestic package treatment plants for domestic wastewater in construction sites and facilities with a population of over 84 people. Domestic wastewater should be discharged to the receiving environment after the discharge criteria are met.

5.8. Waste Management

5.8.1. Hazardous Waste

- Procedures for hazardous waste are carried out according to **"Instructions for Waste (CVR.TLM.001)"**.
- Spill kits should be available in storages of chemical substances, hazardous liquid wastes and waste oils etc. and at all points where chemicals are at risk of spillage, leakage, and spread. If waste oil or liquid hazardous wastes are spilled, it is necessary to respond with the sawdust or emergency spill kit.
- The responsible party/site manager is responsible for recording hazardous waste generated at temporary construction sites and facilities using the "**Current Waste Amounts Form (CVR.FRM.002)**" or the "**Waste Tracking Form (CVR.FRM.014)".** The completed Current Waste Information Form should be submitted to the Environmental Department.

5.8.2. Recyclable Waste

- Processes regarding recyclable wastes should be done according to the ***"Instructions for Waste (CVR.TLM.001)".***
- All packaging wastes (paper, glass, plastic and composite waste) should be collected separately in appropriate

compartments in the Recycling Bins placed in Temporary Site, plant and office.

- Packaging waste from offices should be collected in recycling bins labeled with the waste categories.
- Each personnel in the production units is responsible for the regular collection of waste generated due to the activity for which they are responsible.
- Scrap related operations should be carried out in accordance with the "***Scrap Instructions (CVR.TLM.003)".***

5.8.3. Domestic Waste

- Domestic waste will be disposed in garbage containers placed in designated areas in the facilities. It will be disposed into the garbage containers placed in the kitchens in the offices.
- Processes related to domestic wastes should be done according to the "**Instructions for *Waste (CVR.TLM.001)".***

5.8.4. Waste Storage

- All hazardous or non-hazardous wastes in solid and liquid form should be collected regularly in the temporary waste storage area to be delivered to licensed recycling or disposal facilities within the scope of regulations, without harming the environment. How to design GADS is included in the ***"Temporary Waste Storage Site Preparation Instructions (CVR.TLM.002)".***
- The amount of waste collected and monitored in the GADS should be notified by e-mail to the Environmental Relations Manager with the "***Existing Waste Amount Form (CVR.FRM.002)".***

5.8.5. Sending Waste to Licensed Companies

- The Environmental Relations Manager is responsible for sending hazardous waste generated at temporary sites and facilities and recorded in "***Existing Waste Amount Form (CVR.FRM.002)"*** to licensed recycling or disposal facilities.
- Recovery, disposal at and/or sending the waste for disposal of waste other than the licensed facilities; disposal into the soil, seas, lakes, streams and similar receiving environments, filling, burning, burial and storage are forbidden.

5.8.6. Reporting of Waste

- All recyclable waste is reported monthly through the Zero Waste Information System (EÇBS).
- Waste sent throughout the year is reported via the EÇBS Mobile Waste Tracking System (MoTAT) by the end of March of the following year.
- Generator usage hours for the previous year are reported to the Environmental, Urbanization, and Climate Change Provincial Directorates by the end of March of the following year for each plant.

5.9. Management of Environmental Permits

a) **Obtaining Environmental Permit:** In cases where a process change, capacity increase, or new project is planned at temporary construction sites and facilities, the Project and Rehabilitation Department at Aydem Renewables Headquarters must be informed. Once the process is completed, the HSE and Sustainability Department will be notified.

b) **Project Progress Report:** For projects with a positive Environmental Impact Assessment (EIA) decision, Project Progress Reports are prepared and submitted to the Ministry of Environment, Urbanization, and Climate Change at the intervals specified by the Ministry.

c) **Obtaining Environmental Permits:** In cases such as process changes at temporary construction sites and facilities, the HSE and Sustainability Manager at AYDEM RENEWABLE ENERGY INC. Headquarters must be informed. The process is managed by the Environmental Unit.

d) **Measurements and Analyses:** Measurement and analysis processes required under environmental permits/environmental regulations are conducted by the Environmental Unit.

e) **Document Archiving:** Documents resulting from activities related to environmental regulations must be kept in

a separate folder called the “Environmental Folder” for 5 years.

f) **<u>Environmental Management System:</u>** The entire process is monitored and recorded in the “**Monitoring and Measurement Plan (KYS.FRM.015)**.”

5.10. Biodiversity Management

- Biological Diversity Assessment Reports are prepared and monitored for all operations due to Ecosystem Assessment.
- For wind power plant operations, Biological Diversity Monitoring Studies, which meet the requirements for the Sustainable Management of Living Natural Resources, are conducted and reported in the spring and autumn periods.
- Projects are carried out and reported to support the biodiversity and planning activities that will form the basis for the protection of all areas within the legal boundaries and immediate surroundings of the plants.
- Any findings related to biodiversity in the operations are reported by the plant manager using the **Monthly Environmental Control Form (CVR.FRM.003)** or the **Committee Environmental Audit Form (CVR.FRM.016).**
- The management of plant soil and excavation materials from temporary sites or operations is tracked and recorded in the “**Vegetative and Excavation Soil Storage, Transport, and Reuse Instruction (CVR.TLM.004)”.**

5.11. Climate Change Management

- Carbon footprint calculations and verification are carried out as specified in the “**Greenhouse Gas Monitoring Procedure (CVR. PRS.003)**.”
- Water footprint calculations and verification are carried out as specified in the “**Water Footprint Procedure (CVR. PRS.004)**.”
- Responses to the Carbon Disclosure Project (CDP) Climate Change and Water Security surveys are provided by the end of July each year.
- Aydem Renewables’ science-based targets, including net-zero targets, are tracked annually within the framework of the Science-Based Targets Initiative (SBTi).
- Within the scope of climate change management, processes for Voluntary Carbon Markets and Renewable Energy Certificates are managed.

5.12. Management of Chemicals and Hazardous Materials

- Safety Data Sheets (SDS) for hazardous materials are provided by the Purchasing department. Facilities that store and use hazardous materials are required to keep these forms at the location where the materials are used and to implement the environmental rules specified in these forms.
- It is the responsibility of the HSE and Sustainability Department and the Plant Managers to educate employees about the hazards and environmental impacts of the materials and to ensure that hazard signs are prominently displayed.
- Requirements for storing hazardous materials more safely are described in ***“Working with Chemical Substances and Storage Instructions (ISG.TLM.012)”.***

5.13. New Investments

In the case of planning or executing a new investment, all provisions of this procedure will be applied.

5.14. Site Inspections

Environmental controls are conducted on aspects such as legal regulations, receiving environment, generated waste, current status, and information flow. Environmental site inspections are divided into internal and external audits.

Internal Audits: Conducted periodically at different plants by members of the Life Safety and Environmental Committee, which is formed under the chairmanship of the General Manager and consists of the company's technical managers. These audits are recorded in the "Committee Environmental Inspection Form (CVR.FRM.016)." Additionally, the relevant controls are regularly recorded each month by the plant managers in the "Monthly

Environmental Control Form (CVR.FRM.003)" and sent to the Environmental Unit. If any non-conformance is found during the inspections, it is recorded using the "Environmental Non-Conformance Form (CVR.FRM.004)," and if necessary, a "Corrective Action Form (KYS.FRM.003)" is initiated or recorded in the QDMS Action Module for follow-up.

External Audits: Conducted by consultants, independent auditors, public institutions, investors, credit providers, and similar organizations. If any non-conformance is found during these inspections, a "Corrective Action Form (KYS.FRM.003)" is initiated or recorded in the QDMS Action Module for follow-up.

5.15. Environmental Accident

All employees are responsible for informing the department manager and are responsible for implementing the "**Emergency Response Procedure (OHS.PRS.006**)" as soon as they realize environmental accidents and emergencies in the facility, temporary site or office.

5.16. General Rules for Staff to follow

All staff is required to follow the rules in the documents below.

- Management Manual,
- Procedures,
- EMS Process Identification,
- Job Definitions,
- Related Instructions,

The staff working in Aydem Renewables, are obliged to learn and know the relevant rules, procedures, ***"EMS Process Identification (CVR.ST.001)"*** and instructions. Stating that not knowing such does not remove their responsibility.

5.17 Trainings

Training to be provided to employees is determined by the Environmental Unit at the beginning of each year, communicated to the Human Resources Officer via email, and recorded in the "**Annual Training Plan (HR.FRM.015)**" by the Human Resources Officer.
The Human Resources Officer plans the training and submits it for approval to the General Manager. The approved training plan is then published to Process Owners and Responsible Parties.
Environmental training for new hires or current employees is provided by the Environmental Unit. Training results are recorded using the "**Training Participation Form (HR.FRM.017)**."
Requests for additional environmental training beyond existing programs are evaluated by the Human Resources and Environmental Units, and the provision of appropriate training is ensured.
Training related to environmental matters is listed below.

<u>Training on Environment:</u>

- Main issues related to legal legislation on environment
- Waste sorting methods
- Waste disposal methods
- Zero Waste
- Issues to be considered in the environmental aspects that may occur during and after the operation
- Rules for Working with Chemicals and Disposal of Chemical Waste
- Precautions to Prevent Spills and Environmental Contamination of Chemicals
- Actions to Take in Case of Spills and Leaks
- Sustainability
- Carbon and Water Footprint Awareness

- Climate Change
- Biodiversity

Implementation and recording of the scheduled trainings are carried out as specified in the ***Human Resources Process Identification (IK.ST.001).***

6. ENVIRONMENTAL IMPROVEMENT ACTIVITIES:

To achieve the goals related to the Environmental Management System, necessary activities are determined with the participation of the HSE and Sustainability Manager and the relevant Process Owners, and are recorded in the "**Planning Form to Achieve Goals (KYS.FRM.012)**." The monitoring and evaluation of the planned activities are carried out by the HSE and Sustainability Manager and the Sustainability and IMS Manager.

7. REFERENCE DOCUMENTS:

- CVR.PRS.001_ Environmental Impact Assessment Procedure
- CVR.PRS.002_Greenhouse Gas Monitoring Procedure
- CVR.PRS.004_Water Footprint Procedure
- KYS.PRS.003_ Corrective Action Procedure
- KYS.PRS.006_ Procedure for Assessment of Conformity
- İSG.PRS.006_ Emergency Response Procedure
- CVR.ST.001_Environmental Process Definition
- İK.ST.001_ Human Resources Process Identification
- CVR.TLM.001_ Instructions for Waste
- CVR.TLM.002_ Temporary Waste Storage Site Preparation Instructions
- CVR.TLM.003_ Scrap Instructions
- CVR.FRM.002_ Existing Waste Amount Form
- CVR.FRM.003_ Environmental Site Inspection Form
- CVR.FRM.004_ Environmental Nonconformity Form
- CVR.FRM.005_ Environmental Accident Form
- CVR.FRM.009_ Environmental Targets Monitoring Form
- CVR.FRM.012_Monthly Consumption Tracking Table
- CVR.FRM.014_Waste Tracking Form
- CVR.FRM.016_Committee Environmental Audit Form
- CVR.FRM.030_Wastewater Delivery Receipt
- ENY.FRM.001_Energy Users Form
- İSG.TLM.012_Instructions for working with Chemicals and Storage
- KYS.FRM.003_ Corrective Action Form
- KYS.FRM.012_ Planning Form for Achieving the Targets
- KYS.FRM.013_ Related Party Complaint Monitoring Form
- KYS.FRM.015_ Monitoring and Measurement Plan
- İK.FRM.017_ Training Participation Form
- İK.FRM.015_ Annual Training Plan