



**NUROL HOLDING**  
**SUSTAINABILITY REPORT**  
2021

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## ABOUT THE REPORT

With the release of this report, Nurol Holding provides its stakeholders with its fourth Sustainability Report and updates them on its sustainability performance based on data covering the period January 1 and December 31, 2021. GRI Standards have been followed in the preparation of the report.

### SCOPE

This report has been prepared by compiling information obtained from NUROL Holding, and the NUROL Group of Companies including NUROL Construction, NUROL Makina, NUROL Teknoloji, FNSS, and TŪMAD Mining. NUROL Holding and the five companies listed above can be referred to as "companies within the scope of the Report," while others within the NUROL Group of Companies can be referred to as "non-reporting companies" or "other companies." In addition, the activities of the "NUROL Education, Culture, and Sports Foundation" and the "NUROL Art Gallery" are also mentioned in our corporate social responsibility activities.

Our economic data and financial indicators cover our companies included in the consolidated account statements. The list of these companies can be found in our Corporate Profile section and at [www.nurol.com.tr](http://www.nurol.com.tr), where NUROL Holding 2021 Annual Reports are published as part of the external audit report. The names of all NUROL Group of Companies within or outside the reporting scope are listed in our Corporate Profile section. The terms "NUROL Holding Companies," "Holding Companies," "NUROL Group of Companies," "We," "Group Companies," "Group," and "Our Companies" in this report refer to these companies.

### FEEDBACK

Our sustainability report also serves as a regular communication platform for a with our stakeholders. Therefore, we aim to publish our report every year and further enhance its content. Please contact us through all our communication channels, including e-mail, for your contributions as well as your suggestions, comments, and questions on sustainability issues

E-mail: [info@nurol.com.tr](mailto:info@nurol.com.tr)

**“In a rapidly changing and transforming world, we have taken critical steps to strategically adopt sustainability in all our companies, which has become a priority item for every organization that wants to survive and create value in the future.”**



**Dear Shareholders, Business Partners, and Valued Employees,**

Nurol Topluluğu olarak faaliyet gösterdiğimiz 6 As Nurol Group, we believe that being a part of transformation and being able to adapt to innovations lie at the heart of contributing to the national and global economy and managing the future by growing for more than 55 years in the six sectors in which we operate.

As we all know, sustainability is one of the most significant topics for all mankind collectively. In our rapidly changing and transforming world, we have taken critical steps to strategically adopt sustainability in all our companies, which has become a priority item for every organization that wants to survive and create value in the future.

We will continue to carry out activities involving all our employees, stakeholders, and the ecosystem in the coming period.

We believe that the sustainability of our business is only possible if the world, environment, and the society we live in are sustainable.

As Nurol Group, the main objective of all our companies since the day they were founded is to minimize the environmental impact of all operations, to improve the quality of life of our employees, consumers, and customers, and to secure them against potential risks. When we look back, we are pleased to see that we have not only created economic value with all the projects we have completed but have also provided social and environmental value to our homeland.

While the effects of the pandemic were still being felt and the world economy began to recover in 2021, Nurol Group's more than half a century of experience, robust digital and corporate infrastructure enabled us to maintain our steady growth. With the members of the Nurol Group Sustainability Committee, we carry out sustainable transformation initiatives in all our companies by regularly evaluating environmental and social sustainability elements. We have been able to quickly adapt to the requirements of our stakeholders thanks to our efforts prioritizing digital transformation and transition to a low-carbon economy.

As a group of companies representing our country in international markets, we continue our domestic and international activities in various sectors

such as the defense industry, mining, advanced technologies, real estate investment, finance, tourism, energy, trade, and services, particularly in the construction and contracting sector, by comprehending the market and customer needs and developing creative and innovative solutions. As of December 31, 2021, Nurol Holding's consolidated assets totaled TRY 48.3 billion, while the Group's revenue in the same period was around TRY 12.3 billion, with TRY 21 billion as the target for 2022.

With the awareness of fulfilling our responsibility by contributing to the national economy and creating jobs, we focus on maximizing our capacity and managing our risks well with a balanced portfolio through nearly forty subsidiaries, affiliates, branches, and project partnerships, and more than fifteen thousand employees.

Continuing its efforts to increase the values of the country, Nurol Group of Companies, in line with its corporate policies, has sought to raise the level of implementation in the fields of environment, labor standards, and human rights by fulfilling the requirements set forth in the United Nations Global Compact, to which we are a signatory, since its establishment. The Group also places a high value on the sustainability of the value chain with the awareness that the activities carried out with the principle of continuous improvement will contribute not only to the Group Companies but also to the development of the national economy with a solid infrastructure. In addition to achieving economic growth, our Group companies aim to minimize their environmental impact within the framework of a sustainable business model, while communicating

this understanding to the suppliers and customers with whom they engage. Within Nurol Group, which adopts a risk-based management model, the outcomes of internal data analysis are evaluated according to the data and information obtained from international reports. A sustainability action plan is developed and put into effect in response to climate change, which has been a recurring topic in the World Economic Forum Global Risks Report for years.

As we present our report to our esteemed stakeholders, which covers the sustainability performances of our group companies, I would like to thank all our stakeholders who add value to us, especially our employees.

Sincerely yours,

Nurettin ÇARMIKLI  
NUROL Holding  
Chairman of the Board

As of December 31, 2021, Nurol Holding's consolidated assets totaled TRY 48.3 billion, while the Group's revenue in the same period was around TRY 12.3 billion, with TRY 21 billion as the target for 2022.



## CORPORATE PROFILE

Starting its journey in 1966 as Nurol Construction Unlimited Company, NUROL has expanded its commercial presence thanks to advancements it has made in the industries and regions it operates. Nurol Group, which has become a global brand by realizing significant projects using cutting-edge technologies, has adopted the significance of the environment and people, contribution to society, family values, and progress as its fundamental management principle. Creating added value for the economy through its companies operating in the construction, defense, mining, real estate, finance, energy, tourism, trade, and service sectors, Nurol prioritizes continuous improvement in line with the concept of sustainability, which has become the world's priority, covering all its stakeholders in the value chain. With nearly forty subsidiaries, affiliates, branches, and project partnerships, and over fifteen thousand employees, Nurol continues to maximize its capacity, create jobs, and provide added value to the national economy by prudently managing its risks with a balanced portfolio.

Restructured in 1989 under the umbrella of Nurol Holding, Nurol has achieved sustainable growth by updating its short-, medium-, and long-term plans in accordance with its strategic goals.

The corporate communication activities and audits of the group companies, which are managed by the General Managers in line with the corporate governance principles, together with the Coordination Offices reporting to the Chairman and the Vice Chairman of the Board, are carried out by the central units. The Holding and the companies operating in the defense industry, mining, energy, tourism, trade, and service sectors are headquartered in Ankara, while Nurol Construction, Nurol REIT and Nurol Bank are based in Istanbul.

In accordance with its ethical values since the day it was founded, NUROL, along with its commercial activities, sets strategies and takes part in various initiatives aimed at eliminating social inequalities and improving modern living standards.

Together with all their employees, Nurol Group companies prioritize human and environmental sensitivity as part of their sustainability awareness initiatives, and consider it their duty to serve society, which they identify as the most essential stakeholder. The Nurol Education, Culture, and Sports Foundation, founded by the Çarmıklı Family, has contributed to the development of culture and arts, especially education, since its establishment, and continues its activities to uphold national values.



## VISION

*As the NUROL Family, we are aware of the responsibility we bear. Our objective is to excel in the industries in which we operate by standing out with our high quality, and to create the greatest possible social and economic value for our country.*

## MISSION

*To carry the strong organization we have built with the principles supported by the business experience we have amassed in our country and in many other countries for over 50 years to the next generations, while adhering to traditions and at the same time being open to novelties and developments, and to produce goods and services in the best possible manner with the strength we receive from the society and our employees.*




## CORPORATE STRUCTURE

Nurol Holding is aware that it will achieve its goal of leadership in the sectors in which it operates through the ethical values, fair and transparent management approach inherent in its corporate structure. In addition, it communicates with all stakeholders with the principle of accountability and responsibility and bases the foundation of its management culture on this understanding.

NUROL Holding is managed and represented by the Board of Directors, other than in exceptional situations stipulated by the law. The Board of Directors comprises nine people: one Chairman, one Vice Chairman, and seven members. All members of the Board of Directors have the ability to manage the Holding in terms of their education and business experience. A simple majority is sufficient for the Board of Directors to make a decision. If the votes are equal, the matter is postponed to the next meeting. If the votes remain equal in the second meeting, the proposal is deemed rejected.

NUROL Holding Companies are managed by General Managers along with Coordinators reporting to the Chairman and Vice Chairman of NUROL Holding. The Holding carries out the auditing and corporate communication activities of the companies from the headquarters.

 For the details of the organization chart <https://www.nurol.com.tr/en/organization>

## SHAREHOLDER STRUCTURE

The paid-in capital of NUROL Holding is TRY 776 million, and the distribution of the capital among shareholders is presented below. There is no legal entity among the shareholders.

Name of Shareholder	Share (%)
Nurettin ÇARMIKLI	33,31
Figen ÇARMIKLI	33,31
M. Oğuz ÇARMIKLI	33,31
ÇARMIKLI Aile Üyeleri	0,07

## BOARD OF DIRECTORS AND COORDINATORS

With the Ordinary General Assembly resolution dated November 12, 2021, the members of the Board of Directors were approved to serve until November 12, 2024, as listed in the table below.

Position	Name and Surname
Chairman of the Board	Nurettin ÇARMIKLI
Vice Chairman	M. Oğuz ÇARMIKLI
Member of the Board and Trade Group Coordinator	Eyüp Sabri ÇARMIKLI, PhD
Member of the Board and Human Resources and Public Relations Coordinator	Gürol ÇARMIKLI
Member of the Board	Oğuzhan ÇARMIKLI
Member of the Board	Gürhan ÇARMIKLI
Member of the Board and Legal Counsel	Ad. Cumhuri BOZKURT
Member of the Board and CFO	Kerim KEMAHLI
Member of the Board	Murat SEZGİN
Tourism Trade Group Coordinator	Gaye ÇARMIKLI
Business Development Coordinator	Ceyda ÇARMIKLI

The nomination and election of the members of the Board of Directors are regulated in accordance with Article 13 of the Articles of Association of the Company.

 For more information about the Board Members: <https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/sirketbilgileri/11079>



# NUROL GROUP OF COMPANIES AREAS OF OPERATION



## Construction and Contracting Group

Nurol Construction and Trading Co Inc.  
Nurol Real Estate Investment Trust Inc.  
Otoyol Yatırım ve İşletme INC.  
Nurol LLC (UAE)  
Nurol Georgia LLC  
SGO Construction and Trading Inc.  
RİZE Construction and Trading Inc.  
RİZE İnşaat Yatırım Sanayi ve Ticaret AŞ



## Defense Industry

Nurol Makina Sanayi INC.  
FNSS Savunma Sistemleri INC.  
Nurol Technologies Industry and Mining Trade Inc.  
Nurol BAE Systems Air Systems Inc.  
Nurol İleri Teknoloji Savunma Ürünleri  
Madencilik Sanayi Ticaret INC.



## Mining and Energy

Nurol Energy Generation and Marketing Inc.  
Nurol Göksu Energy Production Inc.  
Enova Energy Wholesale Inc.  
Nurol Grup Elek. Topt. Sat.  
Nurol Solar Energy Production Inc.  
Enova Energy Production Inc.  
Tümada Mining Industry & Trade Inc.  
Gemad Mining Industry & Trade Inc.  
Bahçeşehir Gaz Dağıtım Inc.



## Finance

Nurol Investment Bank Inc.  
Nurol Insurance Brokerage Services Inc.  
Nurol Varlık Kiralama INC.:  
Nurol Portföy Yönetimi INC.



## Trade and Service

Botim Business Management and Trading Inc.  
Nurol Aviation Inc.  
Nurol İşletme ve Gayrimenkul Yönetim INC.  
Rockland Inc.



## Foundation Services

Nurol Education, Culture and Sports  
Foundation  
Nurol Art Gallery



## Tourism

Nurol Hotel and Tourism Management Inc  
Türser Tourism Publishing and Trade Inc.  
Bosfor Tourism Management Inc.

**12.000+**  
EMPLOYEES

**56 YEARS+**  
EXPERIENCE

**35+**  
COMPANIES

**\$ 40 BILLION**  
PROJECT VOLUME





## ECONOMIC OUTLOOK

When we look at some financial figures that reflect the economic outlook of the NUROL Group of Companies, as of the end of 2021, the consolidated assets increased by 66.14%, sales by 37%, gross profit by 74.56%, and earnings before interest, tax, depreciation, and amortization (EBITDA) by 45.06% compared to 2020.

In terms of the Group's turnover as of 2021, the construction and real estate sector accounts for the largest share (37.5%), followed by the mining sector (29.5%). Total assets reached TRY 48 billion by the end of 2021.

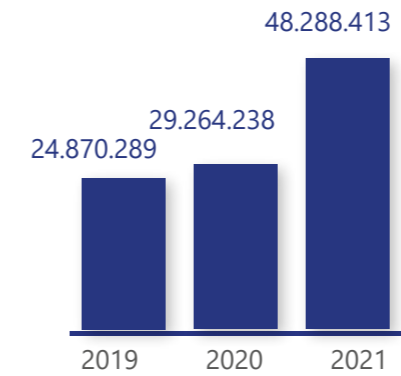
## FINANCIAL INDICATORS

Consolidated – IFRS (Thousand TRY)

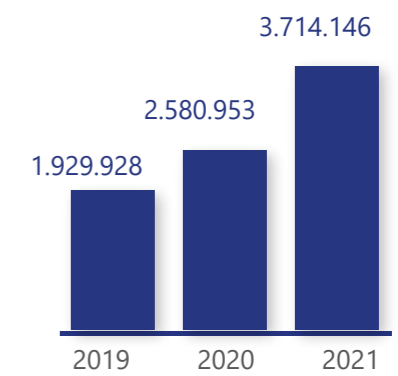
	2019	2020	2021
<b>Total Assets</b>	24.870.289	29.264.238	48.288.413
<b>Total Equity</b>	3.613.685	3.712.752	8.150.077
<b>Investments</b>	881.819	490.410	2.416.049

Consolidated Summary Income Statement (Thousand TRY)

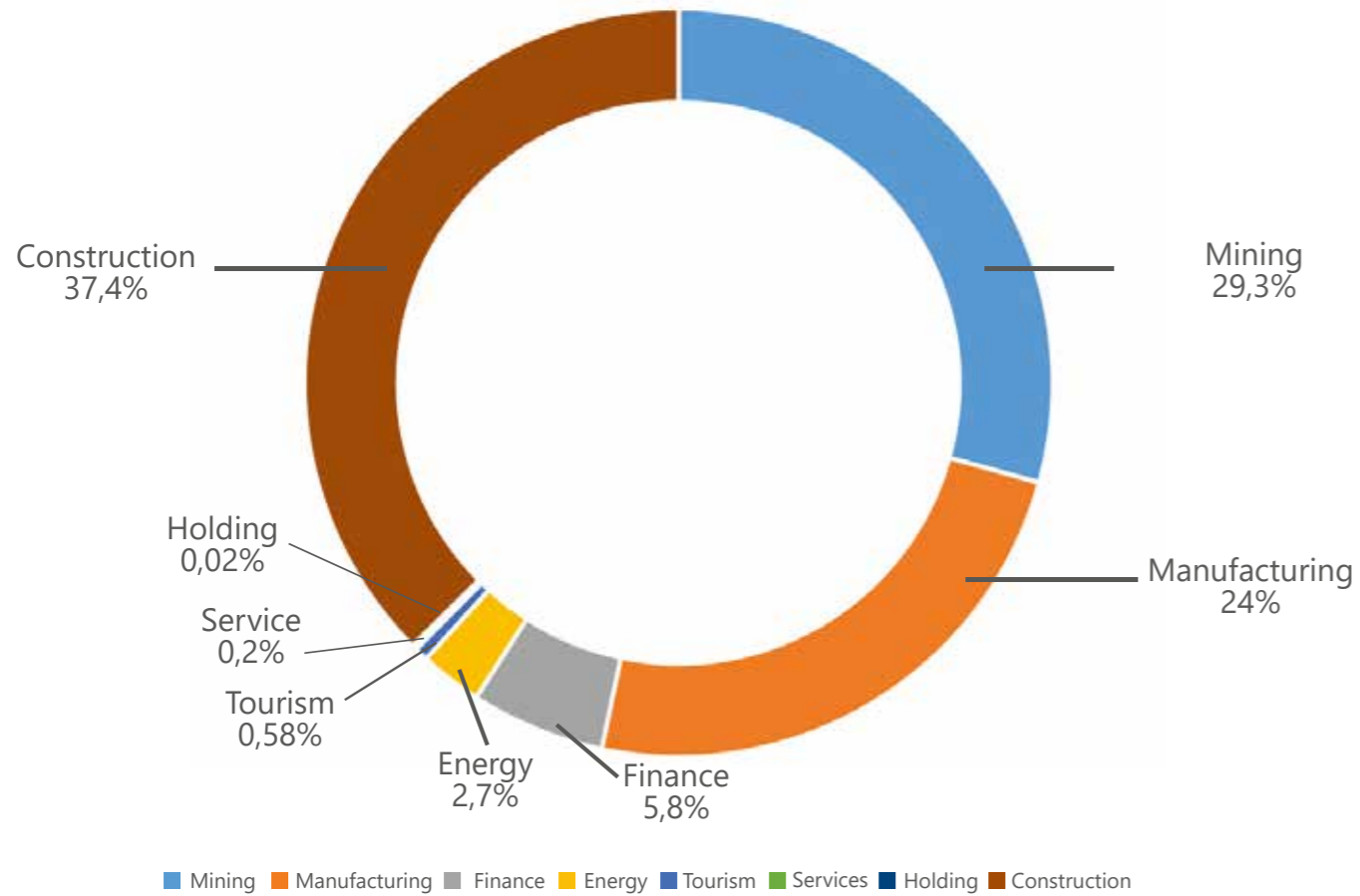
	2019	2020	2021
<b>Sales Revenues</b>	9.074.934	8.953.405	12.266.184
<b>Gross Profit/Loss</b>	2.118.937	2.432.005	4.247.267
<b>EBIDTA</b>	1.929.928	2.580.953	3.714.146



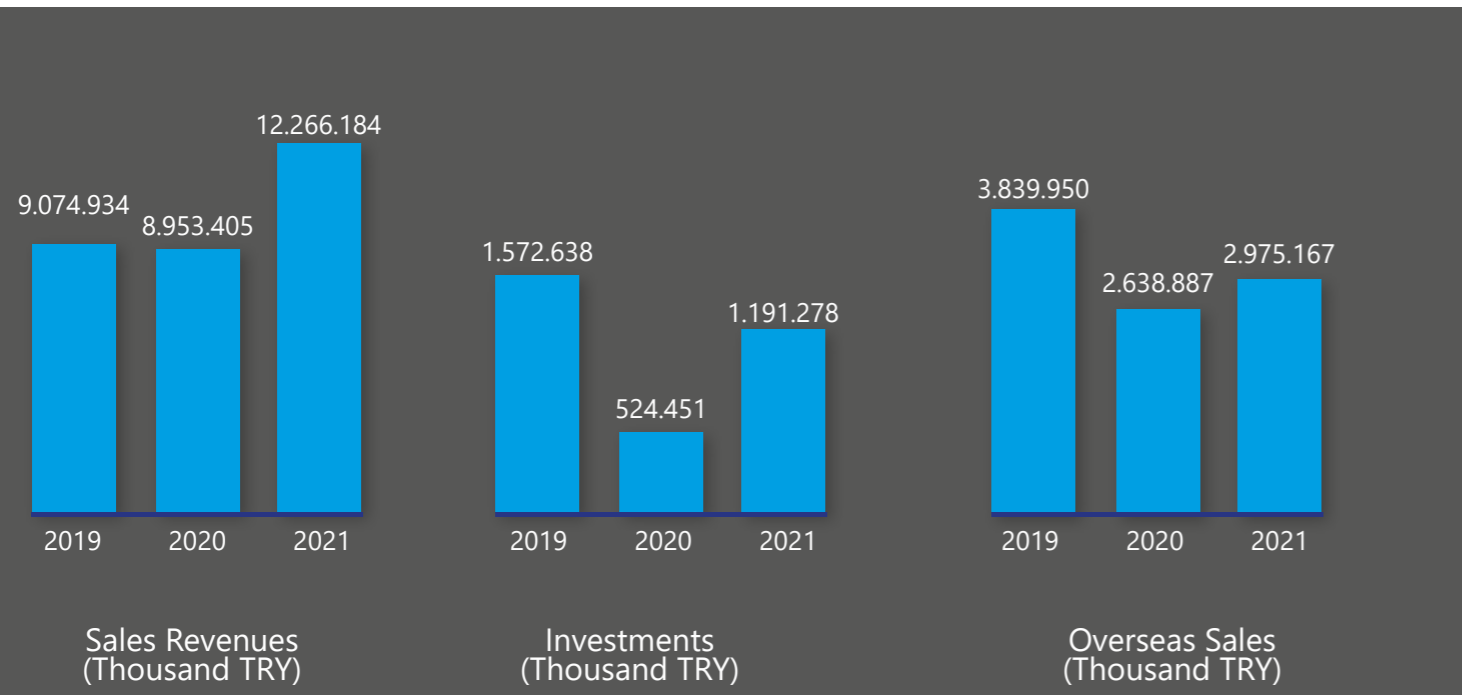
Total Assets (Thousand TRY)



EBIDTA (Thousand TRY)



Sales on a Sectoral Basis



## ECONOMIC IMPACT

1.Direct Economic Impact (Thousand TRY)

	2019	2020	2021
Net Sales	9.074.940	8.953.405	12.266.184
Dividends from investment revaluations using equity	603.577	1.390.722	5.514.162
Income from investments	148.833	75.041	231.298
Financial Return	192.878	126.014	143.436
<b>Revenues</b>	<b>10.020.228</b>	<b>10.545.182</b>	<b>18.155.080</b>

2.Economic Value Distributed (Thousand TRY)

	2019	2020	2021
Cost of Sales (Including Operational Expenses)	7.329.443	6.861.684	8.848.987
Wages and benefits provided to employees	232.364	331.861	863.807
Financial Expenses	2.016.298	2.002.142	2.575.809
Tax Expenditures (Payments to the State)	26.853	44.652	155.701
<b>Costs</b>	<b>9.604.958</b>	<b>9.240.339</b>	<b>12.444.304</b>

3.Economic Value Provided (Thousand TRY)

	2019	2020	2021
Revenues	10.020.228	10.545.182	18.155.080
Costs	9.604.958	9.240.339	12.444.304
<b>Economic Value Provided</b>	<b>415.270</b>	<b>1.304.843</b>	<b>5.710.776</b>

4.Incentive Premiums, Subsidies, Tax Returns etc. Revenues (Thousand TRY)

	2019	2020	2021
<b>NUROL Makina</b>	151	4.169	9.424
<b>Nuro Teknoloji</b>	437	577	3.605
<b>Tümad Mining</b>	5.851	11.444	235.302
<b>Total</b>	<b>6.439</b>	<b>16.190</b>	<b>248.331</b>

# #1 GOOD PRACTICES

As part of the initiatives of Türkiye Circular Economy Platform (TDEP), of which Nurool Construction has been a member since 2019, Nurool Construction, in cooperation with Gölpazarı Municipality, donated approximately ten different types of bricks such as blend bricks, wedge bricks, firebricks, repressed bricks from Nurool Construction facilities to be used in the construction of the “**Learning Center and Exhibition Area Project**” in order to both utilize idle materials and contribute to eco-tourism activities. With the collaboration of Nurool Construction and Gölpazarı Municipality, idle materials were utilized in the most efficient way possible, preventing resource consumption and waste generation.



[https://donguseleekonomiplatformu.com/tmm/post\\_tdep-araciligiyla-19-uygulama-gerceklesti\\_302.html](https://donguseleekonomiplatformu.com/tmm/post_tdep-araciligiyla-19-uygulama-gerceklesti_302.html)

## Shareholder Structure

Institution / Person	Capital Ratio (%)
Nurol Holding A.Ş.	99,9
Members of the Çarmıklı Family	0,1

## Key Indicators

	2019	2020	2021
Average Number of Employees (Nurol Construction + Subcontractor)	11.139	9.226	9.368
Total Assets (Thousand TRY)	9.130.078	11.203.303	19.441.631
Sales Revenues (Thousand TRY)	4.201.005	3.167.455	4.111.047
EBITDA (Thousand TRY)	597.743	165.995	291.517

Nurol Construction (Nurol İnşaat ve Ticaret A.Ş.) is justifiably proud of the global endorsements it has received for its contributions to the construction and contracting sector. With its well-established corporate culture and accomplished staff, Nurol Construction has successfully completed numerous significant infrastructure projects, including roads, bridges, viaducts, tunnels, dams, and superstructure projects for industrial facilities, hotels, malls, housing, and residential units. The company is a member of the Nurol Holding Group of Companies. Nurol Construction is ultimately controlled by the "Çarmıklı" family members. It was established in Ankara in 1966 and moved its headquarters to Istanbul in 2015. In the years of its establishment, it contributed to agriculture through irrigation projects and to heavy industry with turnkey industrial facility constructions. Nurol Construction, which always applies the most effective and innovative technologies in its projects, broke new ground in 1976 and became the first company in Türkiye to use a New Austrian Tunneling Technology in the construction of the Ayaş Tunnel.

Having completed many satellite city and luxury housing projects, both at home and abroad, with its high quality and impressive designs, Nurol Construction has always implemented the most appropriate architectural and engineering solutions in its projects, in line with the requirements of modern life. Ilisu Dam, Türkiye's second largest dam in terms of volume of fill, and the associated HPP project, with its 11 billion m<sup>3</sup> reservoir volume, 1,200 MW installed power and 4.1 billion kWh annual power generation capacity, contribute to overcoming Türkiye's energy deficit.

In the Marmaray Bosphorus Tube Passage Project, Nurol Construction used all technological means available to connect the two sides of İstanbul, constructing a railway track 60 meters below sea level. Significant works that make Türkiye proud have been completed with the use of

state-of-the-art technology, design-oriented engineering solutions, and hundred percent Turkish labor force during the construction phase.

Thanks to the "Gebze-Orhangazi İzmir Highway", which has gone down in history as the largest Build-Operate-Transfer Project in the history of the Republic of Turkey, with a value of \$7.5 billion, the journey by road between İstanbul and İzmir has been decreased from 9 hours to 3.5 hours. Osmangazi Bridge, as the key section of the project, is the world's fourth and Europe's second largest bridge, with a 1,550-meter main span length and 2,907-meter total length when including the linking decks.

In the Southern Approach Viaduct, with a total steel content of 33,000 tons, a world record was broken when a 22,500-ton steel structure was completed with the 1,123-meter push-and-slide method, and the Turkish record was broken when the last deck of 2,600 tons was lifted.

Our construction activities in North Africa, which started in Algeria, have expanded to Morocco. The scope covers a variety of infrastructure projects such as dams, bridges, and highways. Our business development efforts that were concentrated in Eastern Europe paid off with our undertaking of our first highway project in Romania. From the past to the present, Gulf countries have been an important part of the overseas construction activities of Nurol Group of Companies. As part of the ongoing projects in the United Arab Emirates, the total area of housing built within the framework of satellite cities in Dubai, with the region's leading investors, has exceeded 500,000 m<sup>2</sup>, and the urban infrastructure and technological steel manufacturing projects have joined the list of references.

In addition, among our projects in Abu Dhabi are infrastructure works such as sea bridge crossings and canals, various bridge, and tunnel structures, as well as luxury hotels and residences. Nurol Construction prides itself on having featured on the ENR's "Top 250 International Contractors" lists for the last 16 years.

NUROL Real Estate Investment Trust, which comes to the fore with its significant investments among other companies of our Group operating in the construction and contracting sector, continues to serve with housing and office projects (NUROL Park, NUROL Tower, NUROL Life) in İstanbul, and transfers its experience in land development, project design, construction, and marketing to the industry. The public offering of NUROL Real Estate Investment Trust was realized in 1999 and the company was listed on Borsa İstanbul. Nurol Construction's completed and ongoing projects total \$ 28 billion.

Total Project Amount	\$ 28,8 Billion
Total Construction Area	3,6 milyon m <sup>2</sup>
Total Road Construction	1.500 km+
Total HEPP Capacity	1.900 MW+
Total Tunnel Construction	110 km+
Villa and Residence	14.000 Adet+



### ROMANIA

The establishment of the Nurol Construction Romania office started in 2017 and was completed at the beginning of 2018. Business development efforts, especially for infrastructure projects, bore fruit with the Nusalau - Suplacu de Barcau Highway Project, the contract of which was signed in 2020.

Our ongoing projects as of the end of 2021 are as follows:

- Nusalau – Suplacu de Barcau 3B5 Highway Design and Construction Work (km 66 + 500 – km 80 + 054.044)

### ALGERIA

As of the end of 2021, the ongoing projects within Nurol Construction Algeria, which was established in 2003, are as follows:

- Souk Tleta Dam Project
- Boukhroufa Dam Project
- PTO Tizi Ouzou Boura Connection Highway Project

### MOROCCO

The Nurol Construction Morocco office was established at the beginning of 2012 for the construction of Lot 3 and Lot 4 of the Highway El Jadida - Safi Project. After the final acceptance of the project in 2017, business development activities continued in the region.

### TÜRKİYE

The provisional acceptance of the construction works of the Gebze - Orhangazi - İzmir Motorway Project and Balıkesir - Kırkağaç - Akhisar Section Project was made in 2019, and the manufacturing within the scope of the warranty period was completed in 2020. Likewise, the provisional acceptance of the construction works of the Ilisu Dam and Hydroelectric Power Plant Project was made in 2020. The provisional acceptance of the construction works of the Hasankeyf Group Bridges Project was made in 2021.

In our country, where we have been operating since 1966, our ongoing projects as of the end of 2021 are as follows:

- Ilisu Dam and Hydroelectric Power Plant Project
- Hasankeyf Group Bridges Project
- Ordu Ring Road Supply Project
- Eğiste Hadimi Viaduct Project
- Yusufeli Dam Bridges Project
- Silifke-Mut Highway Project
- Ümraniye - Ataşehir - Göztepe Metro Project
- Yeşilyaka Project
- İzmir Çiğli Tram Line Construction Project



## GEORGIA

Nurol Construction Georgia was established in April 2007 in Batumi, Georgia to perform activities in the construction sector. Nurol Construction Georgia has already completed the Tbilisi Ministry of Internal Affairs Complex Project, the Sheraton Hotel and Congress Center Project in Batumi and the construction of company's headquarters. The construction of Sheraton Batumi Hotel, which Nurol Construction Georgia continues to operate, was completed in the spring of 2010. Nurol Construction Georgia completed the Paravani Hydroelectric Power Plant Regulator, Valve Room, Powerhouse Clock and Hydromechanical Equipment Supply Project in 2015.

## THE UNITED ARAB EMIRATES

Nurol U.A.E. was established in April 2003 in Abu Dhabi, the capital of the United Arab Emirates, with a local entity status. The Dubai branch was opened in 2004. The purpose of its establishment is to realize large-scale projects by utilizing the construction sector's potential in the region. Apart from GA09 Golf View Apartments Project, GA14 Golf View Villas Project and Kordon Building Project, which were previously completed and delivered in 2020, our ongoing projects as of the end of the year are as follows.

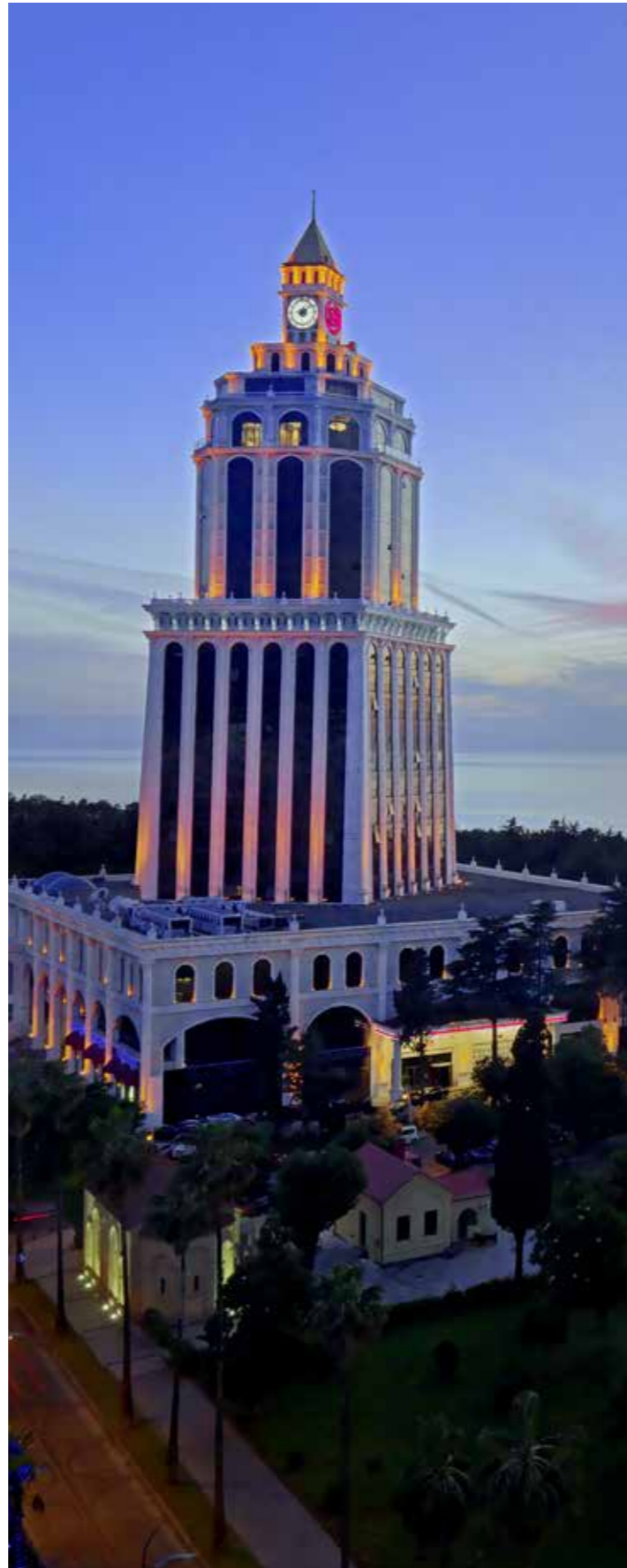
- Riyadh City Phase-4, Infrastructure Project (Abu Dhabi)
- Creek Harbor Development, The Cove Project (P20) (Dubai)
- Creek Gate Buildings Project (P32) (Dubai)
- Vista Beach Towers Project (Dubai)

## IRAQ

The project consists of a silo complex with a capacity of 80,000 tons and 12 warehouses in the Peramagnum region of Sulaymaniyah, Iraq. Final acceptance of the project has been concluded.

## ONGOING PROJECTS WITHIN THE REPORT'S SCOPE

In our 2021 reporting, Nurol Construction's ongoing projects include Konya Eğıste Hadimi Viaduct Project, Algeria Souk Tleta Dam Project, Algeria Boukhroufa Dam Project, Ümraniye - Ataşehir - Göztepe (ÜAG) Metro Project, İzmir Çiğli Tram Line Project and our Headquarters. Kicked-off in 2021, our İzmir Çiğli Tram Line Project is covered within the scope of the report. The environmental, social, and economic performances of these projects demonstrate Nurol Construction's approach to sustainability issues. We strive to more fully reflect our perspective and culture in these areas in the projects we carry out with our partners.



## KONYA EĞİSTE HADİMİ VIADUCT PROJECT

The Konya Karaman Junction Belören Hadim State Highway Eyiste Viaduct Construction Work project started with the delivery of the construction site at the end of 2016 following a tender held by the General Directorate of Highways. As part of the project, one of the world's largest balanced cantilever viaducts with a length of 1,372 meters and a width of 25 meters is being built. The viaduct has two side abutments and eight median abutments with lengths ranging between 31 meters and 155 meters. The project is planned to be completed in November 2022.



## ALGERIA SOUK TLETA DAM PROJECT

The Souk Tleta Dam is being constructed by Nurol Construction to supply 90 hm<sup>3</sup> of irrigation and drinking water to the Tizi Ouzou and Boumerdes regions on Bougdoura Stream, which passes 8 km south of the city of Draa Ben Khedda in the Tizi Ouzou province of Algeria. The clay core soil fill-type dam is 95 m high from its foundation, and the reservoir will have a storage capacity of 90,000,000 m<sup>3</sup> when completed. The project is scheduled to be completed in March 2023.



## ALGERIA BOUKHROUFA DAM PROJECT

The Boukhroufa Dam is being constructed by Nurol Construction on the Boukhroufa Stream, which passes 9 km south of the city of Bouteldja in the El Tarf province of Algeria, in order to supply 125 hm<sup>3</sup> of irrigation water to the agricultural lands in the region. The clay core soil fill-type dam is 87 m high from its foundation, and the reservoir will have a storage capacity of 86,000,000 m<sup>3</sup> when completed. The project is scheduled to be completed in August 2023.

## ÜMRANIYE - ATAŞEHİR - GÖZTEPE METRO PROJECT

A double-tube with a length of 13 kilometers, a singleline TBM tunnel, two train storage tunnels (NATM) and one connection tunnel (NATM) will be built as part of the Ümraniye - Ataşehir - Göztepe Metro Project, which we were awarded under a contract signed with Istanbul Metropolitan Municipality in 2017. The project includes a total of 11 stations, including five main shaft-tunnel type stations, four cut-and-cover stations, and two tunnel stations. With the completion of the metro route under the contract, three districts on the Anatolian side of Istanbul will be connected to each other. The project is planned to be completed in August 2024.

## İZMİR ÇİĞLİ TRAM LINE PROJECT

The construction site delivery of the project, which was tendered on November 5, 2020, by the İzmir Metropolitan Municipality Rail System Department, was made on December 21, 2020. Within the scope of the project, the duration of which is 730 days, a tram line with 15 stations with a length of almost 12 km, a total of six transformer buildings, (5 aboveground and 1 belowground), a tram bridge approximately 500 meters in length, electromechanical works and the extension of the platforms on the Konak tram stops actively used will be completed. The project is planned to be completed in June 2023.





## ONGOING PROJECTS OUTSIDE THE REPORT'S SCOPE

### PTO TİZİ OUZOU BOUIRA CONNECTION HIGHWAY PROJECT

The construction of the 48 km-long connection highway between Tizi Ouzou and Bouira in Algeria is being carried out by the Özgün-Nurol JV. The project includes a 48-km highway, 2 x 1,670 meter-long double tube tunnels and 21 viaducts, as well as other structures and a drainage system. Project Progress: The section between 0+000-10+000 has been opened to traffic, and construction of the remaining sections is continuing. The project is planned to be completed in 2027.

### YUSUFELİ DAM BRIDGES PROJECT

The Yusufeli Dam Bridges project was undertaken by the Nurol-Gülsan JV in 2017, for which 3 balanced cantilever and 1 push-slide road bridge will be built on the Yusufeli (Artvin-Erzurum) Junction State Road. The bridges include the 530 meter-long Şilenkar Viaduct, the 644 meter-long Tekkale (Hazuket) Viaduct, the 695 meter-long Yusufeli Viaduct, and the 340 meter-long Yusufeli Dam Viaduct. The project is planned to be completed in October 2022.



### YEŞİLYAKA PROJECT

This project includes the construction of villas, a social facility, a sales office and a commercial area on a 1,008,732 m<sup>2</sup> area in the Büyükçekmece Sırtköy district of Yeşilyaka. A Mesa-Nurol Joint Venture was established for the Yeşilyaka Project. The project is planned to be completed in 2024.

### ORDU RING ROAD SUPPLY PROJECT

The supply project undertaken by Nurol - Yüksel - YDA - Özka Business Partnership aims to complete the remaining works in the Ordu Ring Road Project. The project is planned to be completed in 2023.

### SİLİFKE-MUT ROAD PROJECT

As part of the Silifke-Mut Road Project, the construction of a 14.2-km 2x2 lane highway together with tunnel and engineering structures will be carried out by Nurol Construction. A double-tube highway tunnel with a total length of 6,870 m, and the 410-meters 2nd Kılıç Arslan Bridge, which will be built using an inclined suspension and balanced cantilever method, are all included in the project. The project is planned to be completed in 2023.



### ILISU DAM & HEPP PROJECT, AND HASANKEYF GROUP HIGHWAY BRIDGES PROJECT

In this project, which is carried out by the Nurol-Cengiz Joint Venture established for the Ilisu Dam and Hydroelectric Power Plant construction project, the body volume of the dam is 23.76 million m<sup>3</sup>. The resulting annual energy production of the power plant, which has an installed capacity of 1,200 MWh, will be 4,120 GWh. The height of the dam from its foundation is 131 meters, and the maximum water level is 528.87 meters. The provisional acceptance of the project has been finalized, and the final acceptance process is ongoing. The project includes the construction of 465-meter-long Hasankeyf-1 Bridge, 1,001-meter-long Hasankeyf-2 Bridge, and 169-meter-long Başur Bridge on the Batman-Hasankeyf and Batman-Siirt roads in Batman and Siirt provinces which were undertaken by Nurol - Cengiz JV in 2013. The provisional acceptance of the project was finalized and the final acceptance process is underway.

### PROJECTS IN ROMANIA

#### Nusfalau – Suplacu De Barcau 3B5 (Km 66 + 500 – Km 80 + 054.044) Motorway Design and Construction

The project is for the construction of a 13.5-km 2x2 highway with five bridges and seven overpass structures. The main contract items include Design, Earthworks, Engineering Structures, Infrastructure Transfers, Subbase, Foundation, Hot Bituminous Mixture, and Bridge and Overpass Construction. The total project duration is 24 months, 6 months for design work and 18 months for construction. The contract was signed on September 30, 2020, and the design work is scheduled to begin in February 2021. The Project is planned to be completed in February 2023.



### PROJECTS IN THE UAE

Nurol B.A.E., Nisan 2003 tarihinde Birleşik Arap Nurol U.A.E. was established in April 2003 in Abu Dhabi, the capital of the United Arab Emirates, with a local entity status.. The Dubai branch was opened in 2004. The purpose of its establishment is to realize large-scale projects by utilizing the construction sector's potential in the region. Nurol U.A.E.'s ongoing projects in Abu Dhabi and Dubai as of the end of 2021 are given below:

#### Corniche Tower Project

The project in Abu Dhabi consists of the construction of a commercial area, offices, and residences at a total construction area of 67,000 m<sup>2</sup>. The construction has been physically completed, and the provisional acceptance process is underway.

#### Dubai Creek Harbour Development, The Cove Project (P20)

Within the scope of the project carried out in Dubai, 3 residence buildings are being built over a total construction area of 76,000 m<sup>2</sup>. The construction has been physically completed, and the provisional acceptance process is underway.

#### Creek Gate Buildings Project (P32)

As part of the project, twin towers containing 471 residences will be built in Dubai. The construction has been physically completed, and the provisional acceptance process is underway.

#### Vista Beach Towers Project

The project consists of the construction of two high-rise residential towers in Dubai port. The construction has been physically completed, and the provisional acceptance process is underway.

#### Riyadh City South Phase-4 Project

The project conducted in Abu Dhabi includes infrastructure work for 3,199 villas. The planned completion date of the project is February 2023.

## NUROL CONSTRUCTION AND SUSTAINABILITY



Nurol Construction, in all its infrastructure and superstructure projects around the world, considers the elements in the value chain with a lifelong perspective and takes steps to minimize its environmental footprint.

Particularly in infrastructure projects that require extensive use of natural resources and energy, Nurol Construction adopts a responsible production and consumption approach, prioritizing resource and energy efficiency while ensuring that the projects it realizes lead to the greatest possible social impact and benefit. One of our most important levers for the effective application of the sustainable business model is our integrated risk management system. In this regard, we thoroughly outline the environmental and social risks associated with our projects and make operating in accordance with sustainability principles a method of conducting business. With this vision and approach, we signed the United Nations (UN) Global Compact in August 2017 and incorporated the ten core principles of the Compact into our activities, which we carry out with great motivation. We became a signatory of the "Women's Empowerment Principles (WEPs)" in 2020 by elevating the goal of empowering women, which we attach special importance among sustainable development goals, to the top of our priority list.

We share the environmental and social performance of our operations in more detail through our NUROL Sustainability Reports. Nurol Construction Sustainability Reports are available at <https://www.nurol.com.tr/en/sustainability>

As part of our sustainable business model, we also see our investments as impact investing and place high importance on value creation. While creating this value, we collaborate with our stakeholders with whom we have a high level of engagement in addition to the engineering activities required by our business. By taking our stakeholders' needs into

consideration, we not only spread our sustainability vision across our value chain and work harder to achieve our shared objective, but we also help them grow. We strive to provide the greatest circumstances for our employees, who are our most significant stakeholders.

We believe that a successful understanding of sustainability can only be achieved if it is embraced by the entire organization and ingrained in the corporate culture. Accordingly, with the awareness of the need to apply a sustainable business model at all levels of our organization, sustainability is included in all our decision-making mechanisms as a basic principle. The determination and implementation of the strategies across our organization, our responsibilities towards Nurol Holding and all other stakeholders, our sustainability approach and performance are under the leadership and responsibility of our Board of Directors, the highest management level of our company.

Nurol Construction established its Sustainability Committee in 2019 in order to achieve effective sustainability management throughout our entire business model. The main objective of the committee is to make regular checks to ensure our business strategy is aligned with our sustainability strategy, and that all our operations are in harmony with these strategies. The main inputs of the Committee are significant risks and opportunities identified within the organization, "Mega Trends" and their consequences, and the company's performance on social, environmental, governance, and ethical issues. The Committee convenes under the chairmanship of the Board Member in charge, and its members are the Assistant General Manager in charge of Financial and Administrative Affairs, Group Managers, Integrated Management Systems Manager, Project Control Manager, Human Resources and Administrative Affairs Manager, Finance Manager, and Business Development Manager. In the 2021 reporting year, Nurol Construction's

commitment to sustainability is clearly demonstrated by the environmental, social, and economic performance that resulted from the sustainability initiatives and best practices applied in our headquarters and in our ongoing projects.

When selecting projects for our reporting, we prefer those that allow us to effectively demonstrate our management skills and those that are not carried out in a partnership structure, but for the last two years, our ÜAG Metro Project, carried out with a partner, has been included in the reporting period. In this way, we aim to reveal our environmental, social, and economic impact in more detail by addressing all the projects in the value chain.

accordance with the same company rules, the M-Files software system installation work was started in 2020 and went live in all our locations in 2021. Applications like Incoming/Outgoing Documents, Integrated Management Systems Document Management, Corrective Action Systematics, Legal Requirements and standard library, Project Control Periodic Reporting, Progress Payment, Material Tracking Report, etc. are actively used within the M-Files software system.

We log all incidents into the QDMS Integrated Software System as part of digitalization efforts, and we provide controls through Central Integrated Management Systems to take actions to prevent recurrence.

### DIGITAL TRANSFORMATION

As part of the digitalization efforts that we have initiated to maintain our operations at the same quality and standards across different regions and to proceed in

TARGET	OUR GOALS FOR 2022
<b>Sustainability Management</b>	Holding sustainability meetings at least four times a year
<b>Management Systems</b>	Obtaining ISO 39001:2012 Road Traffic Safety Management System certification Increasing the number of modules used in M-Files in 2022
<b>Stakeholder Engagement</b>	Organizing Nurol Construction Family Talks at least four times a year for all projects
<b>Environmental Management</b>	Holding quarterly meetings with subcontractors on environmental issues Making improvements in environmental issues in the workplace and projects and reporting the results
<b>OHS-E Training</b>	Per person training rate of office staff to be 135 min/month Per person road traffic safety training rate to be 2 hours/year Per person project training rate to be 55 min/month
<b>OHS Operational Controls</b>	Conducting occupational safety field tours 12 times a year with the participation of the Project Management Reporting at least 120 potential hazards and near misses per year
<b>Accident/Incident Performance</b>	Severity Rate below 1.4 Severity Rate = Number of Workdays Lost * 10 <sup>3</sup> / Total Employee Hours Worked Frequency Rate below 14 Frequency Rate = Total Number of Recordable Incidents / Total Hours Worked x 10 <sup>6</sup>
<b>Emergency Management</b>	Organizing at least four emergency drills per year (1 Environmental Drill, 1 Road Safety Drill, and 1 Evacuation)
<b>Employee Loyalty</b>	Organizing events on a quarterly basis to increase the motivation of employees and their compliance with company working principles
<b>Corporate Communication</b>	Establishing a team of people who want to take an active role in volunteering projects under the name of "Nurol Construction Volunteers" Designing all details, including the budget, of a long-term corporate social responsibility project and presenting it to senior management for approval



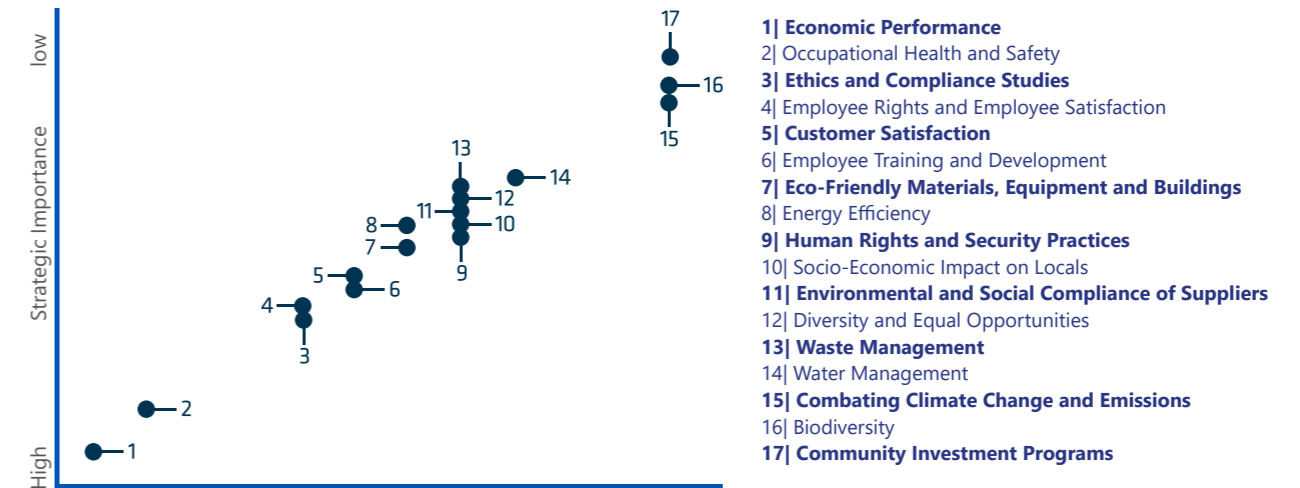
### DIALOGUE WITH OUR STAKEHOLDERS

While shaping our sustainability strategy and priorities, we derive our strength from our dialog and interaction with our stakeholders. In order to create an inclusive and versatile action plan, we have determined the frequency and channels of interaction with our stakeholders. We follow the needs and expectations of the main stakeholder groups we have identified through appropriate dialog platforms. The feedback, suggestions and ideas obtained open doors to continuous improvement and also form the basis of the development of our long-term strategies.

Stakeholders	Dialog Platforms	Frequency of Dialog	Subject matter
Employers - Domestic	Visits, employer and creditor audits, correspondence, meetings, reportings, contracts, progress payments, permits, project approvals, call centers	Continuous, daily, weekly, monthly, when necessary	Project technical meetings, daily site checks, work schedules and deliveries, project drawing minutes approvals, progress payments, manufacturing material approvals, quality control and OHS-E issues, stakeholder issues, expropriation issues, complaints to call centers
Employers - Abroad	Meetings, correspondence, reports, presentations	Weekly, monthly, when necessary	Project progress, quality and OHS-E issues, progress payments, project technical, financial, administrative and contractual issues
Consultant - Domestic	Visits, dialogs, audits, correspondence, meetings, reports, job request and quality test forms	Daily, weekly, monthly, when needed	Administration and Employer correspondence, work progress, job request forms follow-up, project approvals, technical production interviews, quality control issues
Consultants - Abroad	Meetings, correspondence, reports, presentations, site visits	Weekly, monthly, when necessary	Project progress, quality, OHS-E, progress payments, general issues related to the project
Subcontractors	Meetings, proposals, contracts, correspondence, trainings, OHS committees, inspections, site visits, warning and safety signs, reporting, ethics statement, employee notification boxes	Daily, weekly, monthly, when needed	Work schedules, drawing submissions, work progress and planning, OHS-E and quality issues, progress payments, work deliveries
Suppliers	Meetings, proposals, contracts, correspondence, trainings, OHS committees, audits, site visits, order forms, ethics statements	Daily, weekly, monthly, when needed	Payments, standards, quality and OHS-E issues, sectoral developments, financial issues, public order and safety issues
Legislative and Regulatory Institutions	Institution visits, dialogs, correspondence, meetings, field inspections, seminars, permissions, presentations	Weekly, monthly, annually, when necessary	Legislation compliance issues, legal permits, expropriation, public order and security matters, transfers, displacements, line acceptances
Partners	Meetings, correspondence	Weekly, Monthly, Semi-Annually, when necessary	Project progress, quality, OHS-E, mutual interactions, site and field management and sectoral issues, partnership issues
Employees	Trainings, social events, correspondence, meetings, notice boards, intranet, contracts, Nurol Construction Family Chat organizations, corporate website, ethical statement	Daily, weekly, monthly, when needed	Employee job descriptions, IMS notifications, legislative information, personnel rights, Nurol Governance Rules
Union	Meetings, correspondence	Monthly, annually, when necessary	OHS, employee personal rights
Financial Institutions	Project Management visits, seminars, audits	Daily, weekly, monthly, when needed	Project and investment issues, deposit transactions, payments, quality, OHS-E, social impact issues
Society	Correspondence, NGOs, media, social responsibility activities, ethical statement, website, project introduction documents, call centers	Monthly, when necessary	Project-related requests and complaints, environmental issues, project information, expropriation issues
Sensitive Areas / (School, hospital, etc.)	Correspondence, media, project information presentations, call centers	Daily, Weekly, Monthly, When Necessary	Project requests and complaints, public order and safety issues, environmental issues, project information, social responsibility activities
Media	Press releases, interviews, social media, visits, project files, website	Annually, when necessary	Project news, social responsibility news, project promotion, project progress
NGOs	Email, correspondence, seminars	Annually, when necessary	Opinions on legislation, certification
Advisor	Correspondence, site visits, meetings, workshops, report, corrective action forms	Monthly, when necessary	Employer correspondence, work progress, technical manufacturing negotiations, progress payments, OHS-E, technical, legal and financial affairs, sectoral issues, quality control issues, external customer issues, project risk management
Universities	Official correspondence, visits, dialogs	When necessary	Awareness, personal development trainings, experiments, scientific subjects, academic studies, internships
Accredited Institutions	Offers, Email, Visits, Dialogs	Weekly, Monthly, Annually, When Necessary	Awareness, Education, review and testing, certification
Trade Association	Offers, Email, Visits, Dialogs	Weekly, Monthly, Annually, When Necessary	Awareness, Education, review and testing, certification

### OUR PRIORITIES

After our work to determine material issues through the stakeholder participation surveys we carried out for the first time in 2019, and which we plan to repeat once every three years, we have addressed the sustainability issues that have the highest impact on our corporate success and our stakeholders, as well as the issues that our key stakeholders care most about and want to learn about, and have identified the priority sustainability issues. These topics are included in the "Material Issues Matrix" below.



### NUROL CONSTRUCTION PRIORITIZATION TABLE

As Nurol Construction, we are moving forward with a human-oriented approach while realizing all our projects, acting with a perspective that is respectful to our employees, society and the environment in the locations in which we operate. We prioritize occupational health and safety. We offer our employees a safe and healthy working environment and comply with all relevant legislation in this context. We consider the protection of occupational health and safety, structuring and working to prevent occupational accidents as our priority. In addition to our economic growth through our activities, we also provide all kinds of support to our stakeholders in the relevant regions in order to contribute to the local economy in our project locations.

We do not consider sustainability only in terms of the use of natural resources, we evaluate all resource uses. Aware of the importance of human resources, we try to emphasize the "long-term and permanent" outputs of the "working people" that contribute to the sustainability of human resources and the continuity of the organization in the long run. In the following period, we have undergone a serious transformation in the areas of remote working, digital workforce, mobility, employee experience and motivation, job guarantee and continuity. In this process, no employee layoffs and unpaid leave practices were applied in order to prevent any of our employees from being victimized. Although we struggled in the short term, we made the necessary plans for the long term. Our employees worked remotely during this period, no

reductions or deductions were made from their salaries, and their meal cards were loaded monthly. We also focused on reducing the pandemic's effects in 2021.

In order to keep their motivation high, we delivered New Year gift boxes to our employees, and maintained constant communication with them, emphasizing their value to us. In 2021, the general attitude of the Human Resources Department was to act with the principle of engagement and ownership. As of 2021, the Human Resources Department's overarching strategy is to maximize the skills of every employee effectively and efficiently. Focusing on the empowerment of women, as one of the Sustainable Development Goals, we became signatory to the "Women's Empowerment Principles (WEPS)" in 2020, and with over 30 percent female employees at senior management positions, we joined the "30% Club" in 2020, with the representation of our General Manager Nurettin Akdeniz.



## NUROL CONSTRUCTION AND ENVIRONMENTAL SENSITIVITY



Waste management, water management, the use of environmentally friendly materials and energy management, biological diversity and in particular the fight against climate change, are the main factors shaping our sustainability strategy, and are the subjects we target for improvement continuously through the constant monitoring of certain parameters. Nurool Construction, applying the utmost care to satisfying the environmental sensitivities and expectations of all its stakeholders, aims to protect the regions affected by its projects, and to minimize its environmental footprint while maximizing quality in its operations. **Through its policies, it is committed to reducing the consumption of natural resources, and places the protection of the environment at the center of its continuous development efforts.**

We were not subject to any sanctions or penalties in 2021, the reporting period, because of our operations that were carried out in complete conformity with the laws. No environmental accidents have occurred during our projects, and no supplier with a significant negative impact on the environment has been identified in our supplier audits.

By including the preparation of an environmental improvement report in our target projects for 2021, we are encouraging efforts to improve the environmental impact of all of our projects. Also on the agenda in our 2021 target programs are environmental training, environmental field tours, and meetings with subcontractors on environmental issues at a project scale. We plan audits and reviews of the environmental performance of the subcontractors and suppliers with whom we have worked to improve their performance. This has had a considerable impact on our environmental performance and allows us to observe the environmental impacts of their activities.

We prioritize compliance with environmental standards and regulations in the projects we undertake and aim to train personnel who are competent in their fields to apply good practices within our company. Annual training plans are made based on the training requirements analyses we have conducted in the headquarters and project offices. Environmental training programs are organized in accordance with the training plans. A significant part of our environmental training is the waste management and environmental awareness training given to our new employees as part of the orientation training. In 2021, we participated in the Sustainability Mini MBA Program to improve the sustainability-related skills of our environmental teams. The four-week program covered a variety of topics such as the fundamentals of sustainability and climate change, comprehensiveness and diversity, circular economy, green consensus, innovation and entrepreneurship, digitalization, and volunteering.

Training Courses on Environmental Issues	Total Training (man.hours)			Training per Employee (man.hours)		
	2019	2020	2021	2019	2020	2021
Training Courses on the Environment	1.252,8	2.243,3	11.774,5	8,2	7,6	20,5
General Training	28.898,8	97.474,5	127.118,2	155,5	247,3	260,5

### HOURS SPENT ON ENVIRONMENTAL TRAINING

With the publication of the Zero Waste Regulation, we launched efforts to establish a Zero Waste Management approach in our projects and continue to provide training to our employees on Zero Waste. In this context, we provided 5,994 man-hours of zero waste training in the ÜAG Metro Project in 2021. We continued to provide training on the environment in 2021, although our activities in overseas projects were paused due to the pandemic. In particular, the Souk Tleta Dam Project saw a 50 percent increase in environmental training when compared to the previous year. We provided 10,948 man-hours of environmental training within the scope of our ÜAG Metro Project.

### ENERGY AND EMISSIONS MANAGEMENT

The efforts to counter Climate Change, which have gained greater importance due to the increase in social awareness and investor demands, are part of the energy and emissions management. As part of the risk assessments related to environmental issues that we conduct for all projects, we define our sources of direct and indirect emissions and calculate our greenhouse gas emissions. We use the knowhow derived from our previous experiences to determine the actions required for emissions reduction based on a comparison of our projects.

As Nurool Construction, the data we record includes our use of fossil fuels from heating, our electricity consumption, and the fuels we use for company vehicles.

Based on the data we have accumulated, we identify the focus areas where we can reduce our energy consumption and develop reduction plans accordingly. One of the leading energy consumption activities, especially in our dam projects, is the transportation of excavation-filling materials. In order to reduce the consumption of energy during such activities, we determine the transportation routes that will ensure minimum fuel use during the reporting period, thus reducing fuel consumption. In addition, the electricity infrastructures of our facilities are established in such a way that generators will only be activated in the event of failure in the city network. As such, all electricity needs are met from the city network, preventing unnecessary generator use. Furthermore, our employees are regularly informed about means of saving energy and reducing the consumption of natural resources, and efforts are made to prevent unconscious consumption.

Our use of fossil fuels for heating and power, and the fuel we use for vehicles are regularly recorded to monitor our energy usage. The data sets created for projects are assessed by the environmental units to identify potential reductions. To reduce the energy consumption of equipment, scheduled and periodic maintenance carried out and energy-efficient products are purchased. We attach great importance to all awareness-raising efforts in this regard, based on the understanding that the internalization of energy efficiency by society is of crucial importance to public prosperity. Emissions originating from logistics are the main issue in our energy usage in projects away from residential areas. The improvements we make in this area are based on route optimization.



**OUR ENERGY CONSUMPTION**

	Nurol Construction	2019	2020	2021	
Konya Eyište Viaduct Project	<b>In-house Energy Consumption (GJ)</b>				
	<b>Fuel</b>				
	Diesel	914,95	1.973,62	1.813,80	
	CNG	2.412,04	2.431,05	2.638,45	
	LNG	-	-	-	
	<b>Electricity</b>				
	Quantity of Renewable Electricity (HEPP)	-	-	-	
	Electricity Drawn from the Grid (Thermal)	1.516,61	2.450,82	2.342,39	
	<b>Total Energy Consumption</b>	<b>4.843,60</b>	<b>6.855,49</b>	<b>6.794,64</b>	
	Boukhroufa Dam Project	<b>Fuel</b>			
Diesel		115.778,36	105.791,44	93.885,36	
CNG		-	-	-	
LNG		-	-	-	
<b>Electricity</b>					
Quantity of Renewable Electricity (HEPP)		-	-	-	
Electricity Drawn from the Grid (Thermal)		8.271,87	5.274,76	5.815,06	
<b>Total Energy Consumption</b>		<b>124.050,23</b>	<b>111.066,20</b>	<b>99.700,42</b>	
Ümraniye-Ataşehir-Göztepe Metro Project		<b>Fuel</b>			
		Diesel	-	44.843,00	63.057,66
	CNG	-	-	-	
	Doğalgaz	-	40.490,00	247.943,78	
	<b>Electricity</b>				
	Quantity of Renewable Electricity (HEPP)	-	-	-	
	Electricity Drawn from the Grid (Thermal)	-	21.902,87	74.071,80	
	<b>Total Energy Consumption</b>	<b>-</b>	<b>107.235,87</b>	<b>385.073,24</b>	
	Souk Tleta Dam Project	<b>Fuel</b>			
		Diesel	16.739,23	9.053,99	9.136,25
CNG		-	-	-	
LNG		-	-	-	
<b>Electricity</b>					
Quantity of Renewable Electricity (HEPP)		-	-	-	
Electricity Drawn from the Grid (Thermal)		1.415,65	2.965,47	2.356,11	
<b>Total Energy Consumption</b>		<b>18.154,88</b>	<b>12.019,46</b>	<b>11.492,36</b>	
İzmir Çiğli Metro Way Project		<b>Yakıt</b>			
		Diesel	-	-	2.527,34
	CNG	-	-	-	
	LNG	-	-	-	
	<b>Electricity</b>				
	Quantity of Renewable Electricity	-	-	-	
	Electricity Drawn from the Grid (Thermal)	-	-	697,75	
	<b>Total Energy Consumption</b>	<b>-</b>	<b>-</b>	<b>3.225,09</b>	
	<b>TOTAL*</b>	<b>147.048,71</b>	<b>237.177,02</b>	<b>506.285,75</b>	

**OUR GREENHOUSE GAS EMISSIONS FROM ENERGY CONSUMPTION (TCO<sub>2</sub>EQ)**

	Nurol Construction	2019	2020	2021
Konya Eyište Viaduct Project	GHG Emissions			
	Scope 1	203,1	282,6	282,4
	Scope 2	195,9	316,6	302,6
	<b>Total Emission</b>	<b>399,0</b>	<b>599,2</b>	<b>585,0</b>
Boukhroufa Dam Project	GHG Emissions			
	Scope 1	8.579,2	7.839,2	6.956,9
	Scope 2	1.176,4	750,2	827,0
	<b>Total Emission</b>	<b>9.755,6</b>	<b>8.589,3</b>	<b>7.783,9</b>
Souk Tleta Dam Project	GHG Emissions			
	Scope 1	1.240,5	671,0	677,1
	Scope 2	201,3	421,8	335,1
	<b>Total Emission</b>	<b>1.441,9</b>	<b>1.092,7</b>	<b>1.012,2</b>
Ümraniye-Ataşehir-Göztepe Metro Project	GHG Emissions			
	Scope 1	-	5.595,0	18.583,0
	Scope 2	-	2.829,1	9.567,6
	<b>Total Emission</b>	<b>-</b>	<b>8.424,1</b>	<b>28.150,6</b>
İzmir Çiğli Metro Way Project	GHG Emissions			
	Scope 1	-	-	187,0
	Scope 2	-	-	90,1
	<b>Total Emission</b>	<b>-</b>	<b>-</b>	<b>277,1</b>
		<b>11.596,5</b>	<b>18.705,4</b>	<b>37.808,8</b>

\*Data for the last 3 years of ongoing projects.

Not 1: The data presented in the table reflects energy consumption in Scope 1 and Scope 2 based on the methodology used for the calculation of greenhouse emissions, that is, greenhouse gas emissions stemming from the use of machinery and vehicles owned by Nurol Construction.

The increase in the manufacturing activities of our ÜAG Metro Project directly affected the fuel consumption amounts of construction machinery, which led to an increase in emission values compared to our previous reporting period. At the same time, the use of natural gas for processes affected the increase in emissions. Our ÜAG Metro Project has the highest emission values among the projects within the scope of the report, as it has campuses and work sites in multiple locations.

In the previous reporting period, our efforts to save electricity and minimize fuel in our Konya Eyište Hadimi Viaduct, Souk Tleta Dam, and Boukhroufa Projects led to a decrease in our emission amount. The emissions amount of our İzmir Çiğli Tram Line Project, whose works have been actively started as of the second half of 2021, is low compared to other projects.



## WATER MANAGEMENT

Regarding the responsible use of water, as one of the world's most limited resources, Nurol Construction takes great care to minimize its consumption and our pollutant load in all its projects. While focusing on minimizing the internal consumption of water, we also ensure that communities have access to clean and safe water as a company engaged in projects for the supply of fresh water. Water scarcity, as one of the consequences of climate change, prompts us to act more prudently regarding this matter. We determine if there is enough water available in the regions where we carry out projects, and, and manage our water usage based on solutions tailored to the specific region. In our projects, we take precautions to ensure that drinking water and utility water are used responsibly. According to the conditions in the regions where we operate, we implemented a number of procedures throughout the reporting year to minimize water use.



### Konya Eğiste Hadimi Viaduct Project

In order to prevent the continuous use of clean water resources for the mixer, pump, and twin shaft backwashing processes in the concrete plant, the water accumulating in the sedimentation pools is reused for mixer washing. As a result of this practice, we reused 1,198 m<sup>3</sup> of water in 2021. As there is no sewerage infrastructure close to the facility, wastewater is collected in a septic tank, with no discharges is made into the water bodies. In accordance with a protocol signed with the municipality, a vacuum truck regularly empties the tank.

### Boukhroufa Dam Project

In order to meet the water needs of the crusher plant, a bank has been built on the creek bed, and after the water collected in front of the bank is used in the crusher plant, it is rested in the pool in front of the upstream cofferdam, the suspended materials are collapsed, and it is reused in watering the roads with the body filling and in the injection drill. As a result, water consumption has been reduced through the reuse of 190,750 m<sup>3</sup> of the annual 209,500 m<sup>3</sup> water drawn from Boukhroufa Stream. A package biological treatment plant for wastewater management has been established of sufficient volume for the number of employees in our Boukhroufa Dam Project. The necessary periodic controls required for biological treatment are provided, and in the event of any malfunction, plans are in place to remove the wastewater using a vacuum truck for transfer to the treatment plant in the region.

### ÜAG Metro Project

The water used in the wheel washing units is transferred to the sedimentation pool basin and separated from the sludge, and then returned to the system for reuse in the washing processes. In this way, 1,460 m<sup>3</sup> of water was recycled in 2021. In our Ümraniye-Ataşehir-Göztepe Metro Project, the wastewater originating from all our construction and camp sites is discharged into İSKİ's wastewater infrastructure. All the wastewater we discharge is dealt with by the wastewater treatment plants of İSKİ.

### Souk Tleta Dam Project

We raise the awareness of our employees on the conscious use of water through training. In order to prevent the unnecessary use of water, warning signs are in place in locations where water is used. In the Souk Tleta Dam Project, domestic wastewater is discharged into the sewer system located in the lower portion of the construction site by using local septic tanks. This sewage system extends to the treatment plant in the Oued Smar area.

### İzmir Çiğli Tram Line Project

In order to raise awareness on the conscious use of water, warning signs are in place in locations where water use is intense, and our employees are made aware of water waste. In our İzmir Çiğli Tram Line Project, the water supplied from the network is discharged to İZSU discharge lines after use as per the permits obtained. The discharge lines of construction site water are regularly checked to prevent leaks that may occur.

	Nurol Construction	2019	2020	2021
Konya Eğiste Viaduct Project	<b>Amount of Water Used</b>			
	Well Water (m <sup>3</sup> )	-	-	-
	Surface Water (m <sup>3</sup> )	1.057	1.257	1.748
	Municipal Water (m <sup>3</sup> )	-	-	-
	<b>Total Amount of Water Used (m<sup>3</sup>)</b>	<b>1.057</b>	<b>1.257</b>	<b>1.748</b>
	<b>Deşarj Metoduna Göreyillik Atık Su Miktarı</b>			
	Receiving Environment (m <sup>3</sup> )	-	-	-
	Wastewater Channel (m <sup>3</sup> )	1.220	1.220	1.449
	Recovered Water (m <sup>3</sup> )	-	-	-
	<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	<b>1.220</b>	<b>1.220</b>	<b>1.449</b>
Boukhroufa Dam Project	<b>Amount of Water Used</b>			
	Well Water (m <sup>3</sup> )	41.505	20.904	25.475
	Surface Water (m <sup>3</sup> )	200.000	182.000	209.500
	Municipal Water (m <sup>3</sup> )	-	-	-
	<b>Total Amount of Water Used (m<sup>3</sup>)</b>	<b>241.505</b>	<b>202.904</b>	<b>234.975</b>
	<b>Annual Wastewater Amount by Discharge Method*</b>			
	Receiving Environment (m <sup>3</sup> )	59.985	41.903	43.393
	Wastewater Channel (m <sup>3</sup> )	-	-	-
	Recovered Water (m <sup>3</sup> )	-	-	-
	<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	<b>59.985</b>	<b>41.903</b>	<b>43.393</b>
Souk Tleta Dam Project	<b>Amount of Water Used</b>			
	Well Water (m <sup>3</sup> )	16.200	14.850	21.950
	Surface Water (m <sup>3</sup> )	9.480	8.027	-
	Municipal Water (m <sup>3</sup> )	-	-	-
	<b>Total Amount of Water Used (m<sup>3</sup>)</b>	<b>25.680</b>	<b>22.877</b>	<b>21.950</b>
	<b>Annual Wastewater Amount by Discharge Method</b>			
	Receiving Environment (m <sup>3</sup> )	-	-	-
	Wastewater Channel (m <sup>3</sup> )	16.200	14.850	21.950
	Recovered Water (m <sup>3</sup> )	-	-	-
	<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	<b>16.200</b>	<b>14.850</b>	<b>21.950</b>
Ümraniye-Ataşehir-Göztepe Metro Project	<b>Amount of Water Used</b>			
	Well Water (m <sup>3</sup> )	-	-	-
	Surface Water (m <sup>3</sup> )	-	1.047	1.289
	Municipal Water (m <sup>3</sup> )	-	108.727	179.961
	<b>Total Amount of Water Used (m<sup>3</sup>)</b>	<b>-</b>	<b>109.774</b>	<b>181.250</b>
	<b>Annual Wastewater Amount by Discharge Method</b>			
	Receiving Environment (m <sup>3</sup> )	-	-	-
	Wastewater Channel (m <sup>3</sup> )	-	124.673	181.250
	Recovered Water (m <sup>3</sup> )	-	-	1.460
	<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	<b>-</b>	<b>124.673</b>	<b>182.710</b>
İzmir Çiğli Metro Way Project	<b>Amount of Water Used</b>			
	Well Water (m <sup>3</sup> )	-	-	-
	Surface Water (m <sup>3</sup> )	-	-	-
	Municipal Water (m <sup>3</sup> )	-	-	4.788
	<b>Total Amount of Water Used (m<sup>3</sup>)</b>	<b>-</b>	<b>-</b>	<b>4.788</b>
	<b>Annual Wastewater Amount by Discharge Method</b>			
	Receiving Environment (m <sup>3</sup> )	-	-	-
	Wastewater Channel (m <sup>3</sup> )	-	-	3.862
	Recovered Water (m <sup>3</sup> )	-	-	-
	<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	<b>-</b>	<b>-</b>	<b>3.862</b>

## WASTE MANAGEMENT

To comply with legislative requirements and to assure compliance with our environmental management system, we have long been implementing waste management processes in both our projects and our headquarters. Our primary goal is to prevent waste generation, and when it cannot be avoided, we focus on reduction. Waste is collected separately at our project sites and headquarters and sent for the proper recycling. Along with these actions, we have been working to improve this field by incorporating the circular economy concept into our waste management practices.

We identify the sources of waste every month and monitor amounts and report the results in line with our monthly waste management plan. In addition to our legal liabilities, we make sure that waste is collected separately in our headquarters and in all our projects sites and recycled or disposed of according to the type of waste, as defined in our management system. We collect waste separately at all our construction sites where recycling opportunities are available, and work with companies licensed for the recycling and disposal of waste. Depending on the project location, we engage with firms that are capable of organizing the most environment-friendly disposal process if there is no licensed firm or applicable regulations. We meticulously dispose of hazardous waste in accordance with applicable legal requirements.

Before sending our waste to disposal facilities, it is temporarily stored in the waste storage facilities established in all our project sites. These areas are isolated from surrounding settings and built in compliance with the legal standards. Waste is stored in separate storage areas, and environmental kits are in place at the facility to address any leakage or spillage. Firefighting equipment is provided for

the extinguishing of fires in the event of an emergency. The employees who oversee these areas are trained in waste management, ensuring the efficient management of waste on site.

In 2021, we trained our new employees about waste management during orientation training and environmental training. Toolbox training is provided on a daily and weekly basis, especially for our personnel working at construction sites and machinery supply warehouse facilities regarding hazardous waste. As part of circular economy efforts and as per the "Pre-Assessment Support Project" implemented by the Material Marketplace Platform, of which we became a member in 2019, we started to collaborate with an academician and experts from the Sustainability Development Association to evaluate the wastes and idle materials released at the Central Machinery Supply Warehouse Facilities and in the Eğıste Hadimi Viaduct Project. By completing the Pre-Assessment Support Report in 2021, we had the opportunity to evaluate many initiatives about returning the materials into the circular economy. In this context, we continue the process of developing alternative applications for the recovery or recycling of waste.

As part of the waste management activities in our ÜAG Metro Project, we ran a "Bring Old, Take New" campaign for waste batteries used by employees as part of their work, and we collected the waste batteries harmful to the environment. Within the scope of improvement practices in environmental management in our ÜAG Metro Project, we started to produce vermicompost by utilizing organic wastes from the kitchen and cafeteria. Our employees voluntarily contributed to the project in which we used the vermicompost we produced by utilizing organic wastes generated at our Central Construction Site for planting chestnut saplings and approximately 15,000 saplings were planted.

Boukhroufa Dam Project	Type of Waste	Waste Amount	Waste Quantities in the Temporary Waste Area	Unit
<b>Hazardous Waste</b>	Medical Waste	17	0	kg
	Oil	19.200	19.200	lt
	Batteries	121	121	adet
	End-of-life Tires	1.483	1.483	adet
<b>Non-Hazardous Waste</b>	Domestic Waste	68.380	0	kg
	Iron	50.000	50.000	kg

İzmir Çiğli Metro Way Project	Type of Waste	Waste Amount	Unit
<b>Hazardous Waste</b>	Waste Vegetable Oil	55	kg
	Medical Waste	3	kg
<b>Non-Hazardous Waste</b>	Domestic Waste	21.600	kg

Konya Eyiste Viaduct Project	Type of Waste	Waste Amount	Unit
<b>Hazardous Waste</b>	Contaminated Packaging Waste	100	kg
	Concrete Waste	1.200.000	kg
	Methylene blue	55	lt
	Waste Vegetable Oil	50	lt
	Medical Waste	17	kg
	End-of-life Tires	1.650	kg
<b>Non-Hazardous Waste</b>	Domestic Waste	8.700	kg
	Iron	206.500	kg

Souk Tleta Dam Project	Type of Waste	Waste Amount	Unit
<b>Hazardous Waste</b>	Oil	6.963	lt
	Domestic Waste	130.200	kg
<b>Non-Hazardous Waste</b>	Plastic Waste	3.130	kg
	Iron	14.150	kg

Ümraniye-Ataşehir- Göztepe Metro Project	Type of Waste	Waste Amount	Unit
<b>Hazardous Waste</b>	Other Hydraulic Oils	23.680	kg
	Other Engine, Transmission and Lubricating Oils	3.767	kg
	Contaminated Packaging Waste	36.935	kg
	Metallic Packages Containing Solid Structure	7.832	kg
	Contaminated Filters, Absorbents, Cleaning Cloths, Protective Clothing	978	kg
	Oil Filters	1.015	kg
	Contaminated Wood, Glass and Plastic	8	kg
	Medical Waste	12,5	kg
	Batteries and Accumulators	2.195	kg
	<b>Non-Hazardous Waste</b>	Mixed Packaging	705.000
End-of-life Tires		13.500	kg
Edible Oils and Fats		1.505	kg

## OCCUPATIONAL HEALTH AND SAFETY PRINCIPLES

Occupational health and safety (OHS) is one of the main components of Nurol Construction's corporate culture. It is of crucial importance to us to ensure that our employees and our stakeholders, whom we regard as members of the Nurol Construction family, return to their homes safely without suffering any accident at work. We strive to maintain a "Zero Accident" record in all our processes, and it is emphasized at every opportunity that this understanding is an integral part of our culture, especially by our senior management and the Board of Directors. We plan our operations following a risk-based perspective and a principle of continuous improvement.

Our "OHS Policy" clearly reveals the commitment of our senior management to occupational health and safety, and its importance in our corporate culture. Being aware of the importance of leadership in the management of OHS, our leaders strongly follow the necessary rules in their work. We carry out awareness-raising programs for our stakeholders and workers at every opportunity to help them adopt safe working practices in all aspects of conducting business.

We regularly inspect the operations of our subcontractors and suppliers to make sure that they are providing services that comply with our corporate culture and commitments, as well as the legal requirements regarding OHS. We support their efforts to make the necessary improvements in areas related to OHS practices. We inspect the subcontractor sites on a daily and weekly basis and follow up the violations that we have identified and report for corrective actions. Parallel to this, once a year, teams of qualified auditors undertake scheduled audits of our suppliers and subcontractors. Through legal and regulatory compliance checks, we provide mentoring in areas where there is room for improvement.

Nurol Construction sets up an OHS-E committee for its projects, even when it is not mandatory (different countries, number of employees, etc.) and holds annual meetings. Another platform where we hear the opinions of our employees is the "Nurol Construction Family Talks", held quarterly where receive and assess our employees' opinions on OHS, and follow up the related actions.

Many training programs are offered, some of which are outsourced considering the risks involved in our activities, including those for banksman slingers, safe lifting operations, working at heights, scaffolding, the use of chemicals, personal protection equipment, electrical work, and hand tools. In our Eğıste Viaduct Project in particular, we have increased the number of outsourced training programs on working at heights every year. In our ÜAG Metro Project, we provide training to our employees on working at heights and loading/unloading operations every week. We try to include our subcontractor employees in some of the training we provide. In 2021, a total of 104,678.24 man-hours of training has been provided in the locations detailed in the report's scope.

In 2021, we ensured the participation of our teams in training programs such as Advanced Level Training on International Occupational Health and Safety Standards in the Construction Sector, the NEBOSH, Accident Investigation and Root Cause Analysis, Occupational Health and Safety for Working at Heights, Subcontractor OHS Management, OHS Awareness in Workplaces, which will contribute to the development of our OHS professionals.

OHS Training Courses	Total Training (man.hours)			Training per Employee (man.hours)		
	2019	2020	2021	2019	2020	2021
OHS Training	25.538,5	91.684,7	104.678,2	117,1	211,3	207,9
General Training	28.898,8	97.474,5	127.118,2	155,5	247,3	260,5

Total Number of Accidents, Frequency, and Severity Rate	Number of accidents			Total Accident Frequency Rate			Total Accident Severity Rate			Total Working Hours		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
Eyiste Viaduct Project	4	6	4	15	13	8	0	2	4	264.276	472.059	485.064
Boukhroufa Dam Project	15	7	13	18	10	16	14	9	13	834.827	677.933	830.727
Souk Tleta Dam Project	12	3	5	17	6	15	13	4	15	719.376	493.392	321.690
Ümraniye-Ataşehir-Metro Project	-	212	143	-	65	30	-	34	13	-	3.247.100	4.787.138
İzmir Çiğli Metro Way Project	-	-	25	-	-	66	-	-	26	-	-	381.575



In 2021, as part of the fight against Covid-19, we successfully completed the Interim Audit of the TSE Covid-19 Safe Service Certificate, which we received at Nurol Construction head office in 2020 and extended the certificate's validity until December 2022. We swiftly updated our Emergency Plan and followed the required practices in all our offices and projects sites, and guided our teams through a 29-item checklist that covered all relevant circulars and other measures needed to be taken.

In 2021, we continue to publish our "Monthly Integrated Management Systems Bulletin", which we started to publish in 2020 in order to inform the quality, OHS, and environmental practices applied in the projects and to ensure that all project staff is aware of the practices and adapt them to their own projects. We continue to send the "Baha Bişolmaz's Adventures and OHS-E Handbook", which we published in 2020, to our project teams to be given to our new employees. The "GÜÇEK Handbook," which contains work instructions for OHS, was produced for distribution in particular to blue-collar workers for our ÜAG Metro Project in addition to our OHS-E Handbook. In daily activities, we first conduct toolbox training during which we remind our employees of potential dangers and site rules. To support our projects, the "Nurol Construction Toolbox Talks" booklet, providing information on 30 subjects, was prepared by the Central Integrated Management Systems Department, and distributed to all our projects.

We encourage our employees to take an active role in our occupational health and safety management

system and attach great importance to informing them about occupational health and safety and asking their opinions. During the OHS-E Committee Meetings we organize monthly in all our projects, the opinions of our employees on OHS-E issues are received and evaluated with the employee representatives determined in each project. Our employee representatives are expected to garner the opinions of the workforce and convey them to the board, communicating with our blue-collar workers in the field. At the end of the meeting, the minutes of the meeting are announced to the relevant parties for necessary actions. The decisions taken are also published on bulletin boards.

Occupational health and safety issues are also among the issues we deal with in terms of the social and fundamental rights of our workers. We fulfill our obligations while providing the most suitable working conditions for our employees in cooperation with labor unions. We have no formal or informal agreements with any unions in the Konya Eğıste Viaduct, Souk Tleta Dam, and Ümraniye-Ataşehir-Göztepe Metro Projects. Some of the employees working on our Boukhroufa Dam Project are union members. In the contract, matters related to health and safety of the employee, such as Health, Safety and Occupational Health, etc. the Fundamental Rights of the Employees, the Obligations of the Employees, the Rest Rights of the Employees at the Workplace, Legal Rest, Leave and Absence from Work, Change, Suspension, and Termination of the Employment Relationships, Conditions and Rules for Ending Employment Relationships, and Salary, Premium, and Compensation are covered.



The activities in which we are engaged are classified in the very dangerous work group. For this reason, we take the appropriate measures for specific activities that carry particular risks.

- **It is ensured that all personnel use personal protective equipment specific to the work.**
- **Fixed, permanent or temporary warning signs are maintained highlighting the risks in the work area.**
- **Up-to-date warnings and informative posters about OHS are displayed in underground and surface work areas, and at transportation hubs.**
- **Fall prevention systems and appropriate personal protective equipment are used by those working at height.**
- **Red and green label procedures are applied for scaffolds and platforms, with red labels placed on unsuitable scaffolding platforms to prevent their use.**
- **Periodic inspections are made of all lifting equipment and pressure vessels used in the project; vehicles without inspection certificates are removed from the site.**
- **The certificates of the lifting equipment to be used in lifting operations are checked, and the use of equipment that lacks the necessary documents is forbidden.**
- **Construction equipments are used only by authorized/certified operators.**
- **A blasting work permit system is applied in all blasting operations.**

Nurol Construction has defined the process for the examination of events related to occupational health and safety that occur as a result of our activities in the "Incident Investigation Procedure", as the basis of our investigation of occupational health and safety-related incidents on our projects.

### VALUE CHAIN MANAGEMENT

It is our aim to ensure our subcontractors, as one of our most important stakeholder groups, act in harmony with the actions we take in line with the sustainable development goals. Nurol Construction is a member of the Supply Chain and Women's Empowerment Working Group established by the UN Global Compact Türkiye. Accordingly, we strive to share our experience with our subcontractors, and to disseminate examples of best practices in the sector while improving our subcontractor management process, as part of activities carried out by the Supply Chain Working Group within the reporting period. With the "OHS-E Specification" that we have prepared in addition to the subcontractor agreements made in our projects along with the arrangements made in the reporting year, our subcontractors accept that they will fulfill all legal requirements related to OHS and environment during their activities, and that they will operate in accordance with ISO 45001 and ISO 14001 standards, zero accident culture, best practices, our company's current OHS and environment policies, procedures, and plans.

We measure the compliance and performance of our subcontractors based on these standards and policies at least once a year via performance evaluation forms. We also subject subcontractors who completed their work within the year to an end-of-work evaluation. At the end of the year, subcontractors are categorized by the Central Integrated Management Systems Department in line with the scope of the contract. The performance evaluation results are analyzed and shared with the Business Development, Tender and Project Control Departments according to their fields of activity and shared with all projects teams. To get to know our suppliers, both technically and commercially, we create a "Supplier Database" in our head office and project sites, and after working together, we evaluate their performance over our "Supplier Performance Evaluation Form."

By including our subcontractors and suppliers in the training programs, the OHS-E Boards, and the OHS-E coordination meetings we organize within the scope of our projects, we increase their awareness of environmental and OHS issues, and contribute to the improvement of

their processes by sharing our experience with them on the related subject. In addition to the daily and weekly field audits conducted on our projects, we plan third-party audits for our subcontractors and suppliers at the beginning of the year, and we audit their OHS and environmental management systems, especially their compliance with the legal requirements with our internal auditor teams throughout the year. At the end of the audit, we prepare an Audit Report that is shared with the subcontractor/supplier officials via e-mail and by official letter. We follow up the findings in accordance with our corrective action approach. Along with the findings, we also provide support and mentorship on issues that are open to improvement. We share our own practices and contribute to the development of our subcontractors and suppliers, with the awareness that sustainability goals can only be achieved by the adoption of sustainability practices by all elements in the value chain.

### NUROL CONSTRUCTION RISK MANAGEMENT

2021 was a year in which all organizations reviewed their risk management strategy, especially after the pandemic. As an organization engaged in a wide variety of domestic and foreign projects in the construction sector, we act with the awareness that our risk is high due to many variables involved. As Nurol Construction, we derive our strength from our ability to effectively manage risk. We detect and analyze risks and opportunities through our integrated risk management approach. Encouraging stakeholder engagement and taking quick action, while keeping abreast of changes in international standards, our approach has played a crucial role in our successful management of the process. Process evaluation activities, the identification of risks, the evaluation of identified risks, and the determination and monitoring of risk

minimization or prevention strategies are carried out within a certain methodology with necessary prioritization. In the process managed by the Risk and Opportunity Management Plans prepared by the teams, training on the Process Risk and Opportunity Evaluation Procedure is given and detailed information is provided by the Central Integrated Management Systems Department for the "Risk Assessment Teams". Risk assessment teams meet quarterly and update their Risk and Opportunity Management Plans.

Business development and bidding processes, one of the key elements in the implementation of our corporate strategy, are handled in view of the detailed risk analysis. The risks and opportunities identified for individual projects are analyzed considering the associated costs, period, scope, and operational, environmental and social impacts. Risks and opportunities identified during business development processes are reviewed again at the bidding phase. The risk and opportunity assessments drawn up for projects that have reached the bidding phase are delivered to the Project Control Department with the tender file when a contract has been signed with the employer. The Project Manager tasked to oversee the process receives a copy of the Risk and Opportunity Management Plan that the Project Control Department developed after analyzing the risks and opportunities related to the project.

In 2021, the OHS and Environmental risk assessments, which are reviewed at least once a year, were carried out in all our projects, and the assessment teams came together for necessary updates. The risks and opportunities identified for the business development and tender phases are also examined throughout this process, considering the cost, duration, scope, operational, environmental, and social impacts.



# #1 GOOD PRACTICES

The process of separating wastes and recycling as per the provisions of the zero-waste regulation has been validated by the Ministry and a zero-waste certificate has been obtained. In 2021, 79,980 kg of waste were recycled.

## Shareholding Structure

Institution / Person	Capital Ratio (%)
Nurol Holding INC.	58,37
Nurol Construction	41,56
The Çarmıklı Family	0,07

## Key Indicators

	2019	2020	2021
Average Number of Employees	554	543	548
Total Assets (Thousand TRY)	2.614.922	2.351.373	3.785.213
Sales Revenues (Thousand TRY)	963.917	403.753	1.010.474

Nurol Makina ve Sanayi A.Ş. was founded in 1976 for the provision of turnkey industrial facilities, and to meet the requirements of our country in steel construction and equipment manufacturing. Since its establishment, it has undertaken and delivered numerous large-scale projects. NUROL Makina has been active in the defense industry since 1992 and continues to produce 4x4 tactical wheeled armored vehicles in its modern facilities in Ankara.

NUROL Makina's facility, located in the First Organized Industrial Zone in Sincan on an outdoor area of 55,000 m<sup>2</sup> and an indoor area of 17,000 m<sup>2</sup>, also has a vehicle test track for wheeled armored vehicles, where trench crossing and obstacle climbing, side and steep slope climbing, crossing rough terrains, and deep fording tests are performed. Our production facility, which is constantly developing with new investments in order to further increase its global competitive capacity, continues its activities with the latest expansion on a total area of 64,000 m<sup>2</sup> and with the cutting-edge technology infrastructure. Our second facility "Göktürk Branch" opened in Sincan First Organized Industrial Zone is also in operation on an outdoor area of 5,000 m<sup>2</sup> and an indoor area of 4,000 m<sup>2</sup>.

Focusing on indigenous designs and cost-effective production, Nurol Makina has been accredited as an R&D center by the Ministry of Science, Industry, and Technology in accordance with law no. 5746. This accreditation verifies that the company's R&D innovation activities are carried out systematically for the design of new processes, systems, and applications. Nurol Makina designed, produced, and integrated its RN-94 6x6 armored vehicle in 1995, thus having started its activities in the field of armored vehicles. The design and production of anti-riot vehicles (ARV) began in 2002, and its ARVs of various configurations are being used by security forces in Türkiye and other countries. In contrast with previous projects, computerized operator control systems have been designed, and the entire integration process has been completed at Nurol Makina's

facilities. Through this product, the company's experience in the design and integration of electronic hardware and devices has been increased.

In the 2000s, efforts were initiated by Nurol Makina for the design of shelters needed by the Turkish Armed Forces, and the design and manufacturing processes were successfully completed in a short time. The panel manufacturing line used for this product was entirely designed and manufactured by Nurol Makina and completed within the project period. Various shelters have been manufactured to date, including:

- NATO ACE III shelters
- Special shelters used for the production and integration of Aselsan's jamming/neutralization systems
- Production of shelter and integration of electronic components for Aselsan's IRSM project
- Integration of various trailer-mounted generator sets for Aselsan and integration of sensors (including the design and manufacturing of military-type trailers)

The project for the development of a new mine-resistant 6x6 armored vehicle was initiated at Nurol Makina with its own resources in 2006, based on the idea that the Turkish Armed Forces would need mine-resistant vehicles. In this regard, design work and mine testing were carried out, and the prototype vehicle successfully completed qualification tests in all terrain conditions.

As part of the design and integration processes of the vehicle, the CAN-BUS design and application were completed for the first time using local resources, and a new technology was thus acquired. CAN-BUS system significantly facilitates the integration of different systems (engine, transmission box, brakes, gear shift, ABS, axle lock, lighting system, gas pedal, doors, etc.) for central control. Different smart scenarios have become feasible thanks to the system, and the potential for damage to the system as a result of user error has been minimized. A further investment has been made for a press for the formation of the base plate needed for mine-resistant vehicles. This is the first of its kind in our country and is capable of cold forming the base of 4x4, 6x6, and 8x8 armored vehicles. NUROL Makina's technological infrastructure provides it with a high production capacity and includes a 5-axis laser cutter that it uses for processing steel armor; a 7-axis robotic welding machine; hydraulic eccentric presses; heat treatment and painting units; a laser scanning measurement system.

NUROL Makina manufactures 4x4 tactical wheeled armored vehicles (Ejder YALÇIN, Yörük [NMS], Ilgaz, Ejder ARV, and Ejder Kunter) for customers in Türkiye particularly for the Turkish Armed Forces and the General-Directorate of Security, and abroad. NUROL Makina is aware that being part of a large family with its employees is its main source of power and continues its operations in the field of defense by blending its 40 years of engineering experience with its innovative approach, and its adherence to corporate values. NUROL Makina, the leading manufacturer in Türkiye, steadily improves its position in the industry by adopting the principles of national growth, social benefit, and respect for the environment.







### EJDER YALÇIN 4X4 ARMORED COMBAT VEHICLE

A unique multi-purpose platform combining high protection and mobility capabilities, EJDER YALÇIN 4x4 has been developed to meet the operational needs of armed forces and security forces in urban and rural areas. EJDER YALÇIN 4x4 is a platform that has proven itself on the battlefield, having taken place in many operations in Türkiye and those of held by international users.

EJDER YALÇIN 4x4 offers special solutions for various operational needs of the user, such as Border Surveillance and Security Vehicle, Reconnaissance Vehicle, Tactical Missile Transport/Launch Vehicle, Command and Control Vehicle, Air Defense Vehicle, Combat Vehicle, Personnel Carrier Vehicle, CBRN Reconnaissance Vehicle, Mine/IED Disposal Vehicle, Mortar Vehicle, and Armored Ambulance.

Its high payload capacity allows the integration of various payloads into the platform. EJDER YALÇIN offers superior offroad performance without compromising its mobility thanks to its powerful diesel engine, high torque capacity, and fully independent suspension system.

In addition to its superior ballistic and mine protection features, the design of the vehicle meets the operational and ergonomic requirements of its users as an ideal platform, allowing its crew to work more efficiently and safely.

### YÖRÜK 4X4 ARMORED COMBAT VEHICLE

YÖRÜK 4x4 vehicle features a unique design and a "V-shaped" monocoque body. Its advanced drivetrain makes the vehicle fast and highly maneuverable in rural and urban areas. Its low weight and high protection capabilities provides operational superiority and high flexibility against the most challenging and asymmetric threats. The design concept that promotes multi-mission readiness offers combat units a variety of capabilities, from transporting weapon systems to reconnaissance missions.

YÖRÜK 4x4, the new generation vehicle, is an ideal combination of scalable composite material armor. The modular design of YÖRÜK 4x4 enables users to carry out a variety of special operations, including combat operations, troop and material/equipment transportation, air defense, and reconnaissance.

### EJDER TOMA 4X4 ANTI-RIOT VEHICLE

Ejder TOMA 4x4 ART, one of NuroL Makina's indigenous designs, has been developed to maintain public order and security in rural and urban areas and borders with its exceptional offroad performance. All tools, equipment, electronics, and software used in the Ejder TOMA 4x4 have been developed by NUROL Makina. Thus, any configuration modifications or additional requirements can be implemented at minimum cost and effort, even on vehicles already in service.

With its 4x4 mobility, indigenous-military chassis, and fully independent suspension system, Ejder TOMA has been manufactured to enable security forces to intervene the riots rapidly and effectively.



### EJDER KUNTER SPECIAL-PURPOSE PLATFORM

Indigenously designed by NUROL Makina, EJDER KUNTER is a platform with a fully independent suspension system and 4x4, 6x4 and 6x6 features. With its superior offroad performance, EJDER KUNTER can serve in all kinds of terrain conditions both in urban and rural areas, and its ergonomic front cabin with ballistic protection enables the user to fulfill his mission safely and with high performance.

EJDER KUNTER's indigenous system design can be configured according to user demands and allows the integration of weapon turrets and other platform solutions. According to customer requirements, EJDER KUNTER can be tailored for military, security, and civilian functions.

### ILGAZ II INTERNAL SECURITY VEHICLE

ILGAZ II is an indigenous platform designed by NuroL Makina for enabling special operations units, military units, and security forces to restore public order in rural and urban areas, to perform rapid deployment missions, and to disperse illegal demonstrations and riots. In the design and development of ILGAZ II, the security of the crew was considered, and a platform that would ensure safe use was produced.

ILGAZ II offers special solutions for various operational needs of the user such as Ambulance, Anti-Tank Vehicle, Combat Vehicle, Command and Control Vehicle, Reconnaissance and Surveillance Vehicle, Counter-Terrorism Vehicle, Internal Security Vehicle, and Crime Scene Investigation Vehicle. ILGAZ II offers its users different driving modes – 4x4 and 4x2.



## NUROL MAKİNA and SUSTAINABILITY

As Nurol Makina, we consider the expectations and priorities of all our stakeholders in our value chain and continue our efforts to create common value with the products and solutions we develop. Compliance with international quality and military standards begins at the design stage and continues throughout all development stages of the product. Developing innovative products with a holistic approach and maximizing the local content rate in its products are amongst Nurol Makina's main objectives. In addition, the logistic support concept, which starts during the design phase of the product and continues throughout the product life cycle, is one of the topics that NUROL Makina places a high priority on. The sensitive approach to user feedback, and the maintenance and repair services provided throughout the life cycle of the systems play a key role in ensuring user satisfaction and strengthening the bond between NUROL Makina and the user.

We believe R&D activities and high-tech products are the foundations of sustainable growth, and we contribute to our national economy with the exports we realize. While the R&D efforts we focus on contribute to the improvement of our products, we also support the technology development and, from a broader perspective, we contribute to the growth of our country by providing advantages to domestic suppliers.

We conduct our R&D activities with the principles of continuous improvement and innovation, and we make investments to increase our new product development

capacity. Some of our investments, for which feasibility analysis was made or realized during the reporting period, include Sub-Component Welding Robot Investment, Rotator Investment, Perforated Flexible Fixture and Spectrometer Investment.

NUROL Makina, while setting its goals in sustainability management, prioritizes increasing involvement in continuous improvement activities, reducing the consumption of natural resources per capita, and minimizing hazardous substances per vehicle produced. Our approach for the sustainable development of our workforce involves investing in our people, which we consider to be our valuable resource, and increasing employee training hours.

### DIALOG WITH OUR STAKEHOLDERS

As a company that has been operating in the defense industry of our country for more than 25 years, we have learnt that sustainability cannot be achieved alone, but in collaboration with our stakeholders. Accordingly, we have determined that stakeholder communication is a necessity for us. The information they provide contributes to our continuous improvement and developing strategies. Our communication with our stakeholders is presented in the following table:

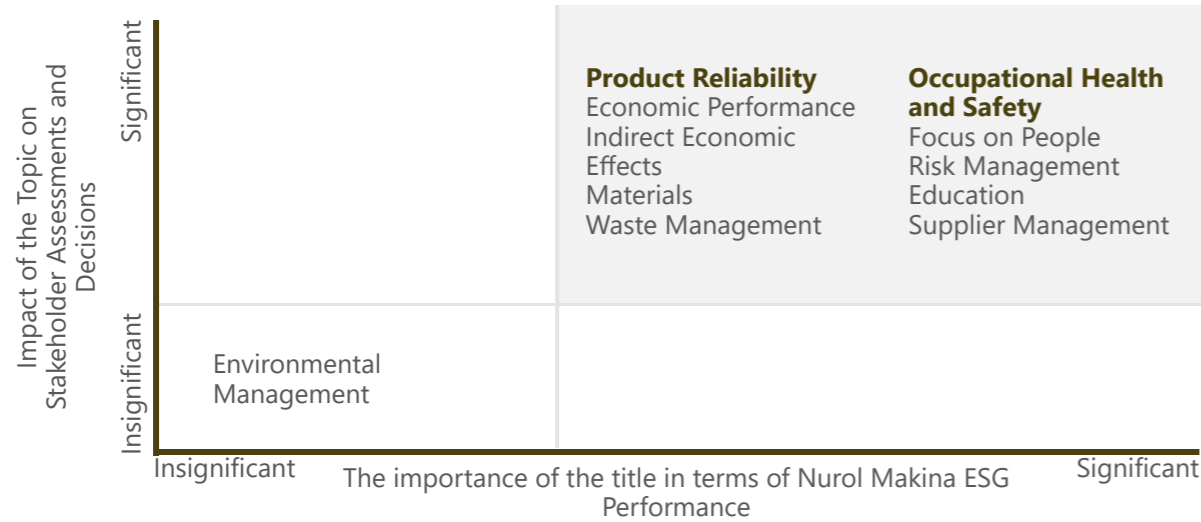


Stakeholders	Dialog Platforms	Frequency of Dialog
Legislative and Regulatory Entities	Inspections, visits, conventions and workshops, (ministries), e-government, integrated environment information system, TSE	When necessary, biannually, when mandatory
Shareholders	Board of Directors meetings, Annual Reports	Quarterly, annually
Financial Institutions	Visits and Dialog, Annual Reports	Annually, when necessary
Competitors and the Private Sector	Domestic and International Sectoral Fairs, Sectoral Events, Events organized by the Presidency of Defense Industries, such as Conferences, Congresses, Meetings, etc. Corporate Web Page, Nurol Holding Annual Report,	Annually, monthly, when necessary
Customers	Corporate Web Page, Advertisements, Visits, Fairs	Continuous
Employees	Trainings, Monthly and Weekly Bulletins, In-Company Applications	Annually, monthly, weekly
Society	Social media, corporate website, product websites, Nurol Holding's operating report	Continuous
Media	Sector-specific publications, press bulletins, corporate website, social media platforms, Nurol Holding's operating report, advertisements, World of Nurol magazine, state-run and private television stations in Turkey and abroad	Annually, monthly, when necessary
Sector-wide Associations	Association Meetings, Congress and Seminars, Sectoral Studies	Annually, when necessary
Consultants	Meetings and Trainings, OHS Consulting, Environmental Consulting	When necessary, when mandatory
Suppliers	Meetings, Proposals, Contracts, Trainings	When necessary, annually
NGOs	Corporate Web Page, Social Media, World of Nurol magazine	When necessary

### OUR PRIORITIES

We arranged a workshop while deciding on an effective roadmap for sustainable business management, taking into account the requirements and expectations of our stakeholders as well as the critical issues mentioned by our staff, particularly the senior management. We also reviewed our sustainability strategy on the basis of the issues identified there.

### PRIORITIZATION MATRIX



\*Important issues related to the supply chain are written in green.

The importance that we attach to people is reflected in our prioritization matrix, and creating a healthy and safe work environment for our all suppliers and employees is at the core of our business principle. The R&D activities on which we are focused on are constantly developing as a result of the knowledge and experience of our competent human resources and our “people-oriented” approach and enable our company to make a difference in terms of “product reliability”. The resulting direct and indirect economic benefits underpin our constant growth, along with that of our value chain.

#### NUROL MAKİNA AND ENVIRONMENTAL AWARENESS

Being aware of the fact that companies that create a difference and the add value to their sector are distinguished by their environmental performance, Nurool Makina pays special attention to keeping its environmental footprint at the lowest level within the entire value chain. Within the framework of the circular economy concept, all products included in the economy remain within the system as a raw material, while providing economic benefits and reducing natural resource consumption. As part of our environmental policy, we undertake:

- to comply with the applicable legislation and national and international standards;
- to bring all environmental risks under control through continuous reviews, and to minimize all potential environmental risks;
- to ensure continuous improvements to environmental performance, and to make them permanent while adopting openness to innovation as our fundamental philosophy;
- to organize various events, including courses, workshops and seminars, to raise the environmental awareness of all our employees, and to create a long-lasting Company culture;
- to ensure that our employees, subcontractors, interns and visitors are able to work in an environmental-friendly workplace, and to carry out operations aimed at protecting and preserving the health of all;
- to minimize the damage to the environment by adopting an environmentally friendly approach,

making an efficient use of resources and ensuring effective waste management,

- to ensure that the design, production, distribution, consumption and disposal of the company’s products and services do not lead to an uncontrolled increase in environmental impacts by taking a preventative approach to the lifecycle;
- to inform all of our stakeholders about our responsibilities to people and the environment, to ensure their involvement, and to organize training and other such activities to this end, as in previous years.

Special attention is paid to compliance with our environmental management system and the binding standards and regulations. Furthermore, our compliance and the effectiveness of our system are regularly audited in accordance with ISO 14001:2015. Under our environmental management system, we expect all units to evaluate their environmental impacts, taking a broad perspective. Based on the results of this evaluation, we carry out a risk analysis study taking into account the identified environmental risks. We analyze various parameters, including emissions to air, emissions to water and soil, energy use, energy emissions (e.g. heat, noise, light, etc.) in accordance with the environmental performance criteria we have established for the management of our environmental risks.

The ultimate goal of our environmental efforts is to reduce greenhouse gas emissions and our consumption of natural resources, while increasing the quantity of our waste recycling processes.

NMS	2019	2020	2021
Scope 1 (Combustion of Fuels)	-	638,15	686,2
Scope 2 (Electricity Consumption)	-	1503,39	1647,71

### HOURS SPENT ON ENVIRONMENTAL TRAINING

In addition to the training provided to our employees regarding the environment, we try to keep their environmental awareness and that of their families through the activities we organize. In 2021, both the electronic waste generated at the factory and the waste generated in the homes of employees were collected and donated to the Educational Volunteers Foundation of Türkiye (TEGV), and the school expenses of children in need were covered in return for these donations.

Training Courses on Environmental Issues	Total Training (man hours)			Employee Training (man hours)		
	2019	2020	2021	2019	2020	2021
Training Courses on the Environment	772	170	1040	2	2	2
General Training	21.836	6.911	19,613	40	12,72	36

### ENERGY MANAGEMENT

In order to reduce energy consumption and plan improvement areas, it is planned to minimize the environmental impact resulting from energy consumption. In this context, the high temperature that emerged with the operation of the compressors in 2021 was associated with a serpentine to be used in the heating of the factory domestic water system.

An automated watering system was installed to reduce water consumption during green space watering. In this regard, watering was done between sunset and sunrise, minimizing evaporation, shortening the duration of irrigation work, and preventing excessive water use.

The energy waste produced by the compressors’ stop-start operation was minimized by connecting air tanks to the compressed air line.





NUROL Makina	2019	2020	2021
<b>In-house Energy Consumption (GJ)</b>			
<b>Fuel</b>			
Natural Gas	11.847,11	11.810,65	12.701,92
Diesel(Vehicle)	141,75	-	-
<b>Electricity</b>			
Electricity from the Grid	9.049.854	9.299.321	10.191.999
<b>Total Energy Consumption</b>	<b>21.038,74</b>	<b>21.110</b>	<b>22.893</b>

## WATER MANAGEMENT

We focus on the efficient use of water to manage the water crisis that is increasing in parallel with rising temperatures and the risk of desertification. We aim to minimize our effects on the basin in which we operate through efficiency projects related to water, which is a local resource.

NUROL Makina	2019	2020	2021
<b>Amount of Water Used</b>			
Well Water (m <sup>3</sup> )	-	-	-
Municipal Water (m <sup>3</sup> )	13.278	13.349	16.068
Total Amount of Water Used (m <sup>3</sup> )	13.278	13.349	16.068
<b>Amount of Wastewater Discharged Annually</b>			
Recipient Environment (m <sup>3</sup> )	0	0	0
<b>Wastewater Channel (m<sup>3</sup>)</b>	<b>13.278</b>	<b>13.349</b>	<b>16.068</b>
<b>Recovered Water (m<sup>3</sup>)</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	<b>13.278</b>	<b>13.349</b>	<b>16.068</b>

## WASTE MANAGEMENT

As NuroL Makina, we see circular economy practices in waste management as an important opportunity and focus on significantly directing our waste to reuse. In accordance with legal requirements, our waste is disposed of by authorized institutions. Packaging waste is stored in the temporary waste area created within the facility. It is collected by a licensed packaging waste collection company and recycled in accordance with environmental legislation.

As a result of these efforts, Hazardous and Non-Hazardous Wastes are collected separately at source, and evaluated according to their recovery status in the Waste Temporary Storage area. Thus, in our enterprise, no waste is disposed of without having completed its economic life to the maximum extent. In order to prevent waste generation, first of all, waste generated as a result of facility activities is sought for a different purpose or for reuse within the factory.

NUROL Makina	2019	2020	2021
<b>Quantities of Hazardous Waste (kg)</b>			
Hazardous Waste	42.070	20.065	11.350
Medical Waste	20	89	23
Amount of Contaminated Packaging	-	2.857	299
Contaminated Waste (Protective Clothing, Oil filters, oily cloths, etc.)	-	2.610	1.674
Hazardous Parts and Process Waste	-	19.960	14.520
Liquid and Solid Fats/Oils	-	10.700	16.519
<b>Total Quantity of Hazardous Waste</b>	<b>42.090</b>	<b>56.281</b>	<b>44.385</b>
<b>Quantities of Non-hazardous Waste</b>			
Scrap Waste	-	537.022	651.358
<b>Home Waste</b>	<b>-</b>	<b>678,5</b>	<b>556,5</b>
<b>Iron and Steel</b>	<b>-</b>	<b>4.140</b>	<b>4.937</b>
<b>Packaging Waste (Paper - Cardboard)</b>	<b>42.940</b>	<b>40.000</b>	<b>86.660</b>
<b>Total Quantity of Non-hazardous Waste</b>	<b>42.940</b>	<b>581.841</b>	<b>742.955</b>

## OCCUPATIONAL HEALTH AND SAFETY PRINCIPLES

Providing a healthy, clean, and safe workplace is important to our company and to our stakeholders. Within our company, the necessary precautions are taken to prevent work accidents and occupational diseases, and regular Occupational Health and Safety training is provided to employees to raise awareness.

OHS Training Courses	Total Training (man hours)			Employee Training (man hours)		
	2019	2020	2021	2019	2020	2021
OHS Training	6880	170	6480	12,28	2	12
General Training	21.836	6911	19,613	40	12,72	36

All activities carried out at the NuroL Makina facilities are in compliance with the Subcontractor OHS and Environmental Procedure. Occupational health services are provided with a preventive medicine approach. All accidents are recorded, regardless of the severity of the injury. They are reported to the Social Security Institution within three working days at the latest. Accident statistics are communicated to the senior management on a monthly basis, and employees are informed via occupational safety notice boards. Announcements detail the types of accidents, the injury types, and the areas in which the accidents occurred, and provide statistics.

Total Number of Accidents, Frequency, and Weight Ratio	Number of accidents			Total Frequency of Accidents			Weighted Ratio of Accidents			Total Working Hours		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>NUROL Makina</b>	12	13	19	7,72	8,21	11,78	0,015	0,017	0,011	125,02	126,88	129

An accident investigation team was formed to examine incidents such as work accidents, near misses and unsafe situations from different perspectives, to reveal root causes with a common mind, and to prevent similar incidents by spreading the action plans to be created against these root causes throughout the factory.

In addition, OHS suggestion competitions were held to increase the contributions of our colleagues to OHS studies, and to increase their awareness of possible occupational accidents. The employees whose suggestions were accepted received awards.

**VALUE CHAIN MANAGEMENT**

We consider the suppliers in our value chain to be our most important supporters in our fight against climate change, leading us to establish an “Auxiliary Industry Management Strategy” for the continuous development of our suppliers. This strategy has been devised taking into account national and international competition, as well as the requirements of our national defense strategy.

For the implementation of this strategy, auxiliary industrial evaluations and development activities are carried out under the coordination of the Quality Assurance Directorate, with contributions from the Allied Industry Assessment and Development Department, the Planning and Procurement Directorate and the Operations Directorate. The aim is to ensure the continuous development of existing suppliers and the participation of new firms in NuroL Makina’s portfolio through regular quality audits.

The sub-industry application and evaluation process in the reporting period continued in 2020 with the Enterprise Resource Planning Software, the infrastructure works of which were completed in 2019. Due to the high standards of the sector in which we operate in the supplier evaluation process, the field control and evaluation of suppliers are carried out by expert teams under the coordination of the “Allied Industry Assessment and Development ” and “Quality Assurance” departments, addressing the following items:

• **Quality Systems**

Quality system evaluations are based on ISO 9001 and AQAP 2110 requirements.

• **OHS and Environmental Assessment**

The TS ISO EN 14000 and TS 45001 requirements are applied for occupational health and environmental assessments.

• **Human Resources**

Assessments of human resources involve the verification of qualifications through various steps, including an analysis of the list of people formally employed by the company, the social security records of the employees, job and role descriptions, and the operational steps for which they are responsible.

• **Production Assessment**  
• **Welded Manufacturing**

The EN 1090-1 and EN ISO 3834-2 standards are used as references for welded production.

- **Machining**
- **Cutting & Bending**
- **Coating**
- **Dye**
- **General Assessment of Production**
- **General Assessment**

Compliance of infrastructure for the firm’s movements of parts, compliance of the intermediate product/finished product stock areas, measurement equipment, non-destructive inspection, heat treatment infrastructure, product shipment actions, and the firm’s information technology infrastructure are all analyzed in the general assessment process.

In addition to these processes, Allied Industry Assessment and Development Department continues its activities with a view to gaining new process competencies within the existing auxiliary industries, thus developing and expanding the supplier portfolio, researching new companies and forming new strategic business partnerships in line with needs.

Within all these processes, the main expectation is to be able to manage the production and quality of the companies within its own structure, to have increased control and reporting competencies, to have the necessary infrastructure for product traceability and for the keeping of records, to have increased inappropriate product management competencies and to be able to offer turnkey products.

As with all of our stakeholders in our value chain, we adopt a permanent, continuous improvement-oriented supply management approach that emphasizes interactions with our suppliers. Strategic Supply Chain Management aims to ensure integration by increasing the interaction between the demand and supply processes in terms of product and solution development capabilities, and to meet customer demands in the most and effective way at the lowest cost. In line with NuroL Makina’s determinations and targets, our Supply Chain Management priorities are:

- To ensure compliance with lead times by optimizing the time from order and design to production and delivery; and carrying out shipments correctly, safely, quickly and at the most affordable cost,
- Identifying alternative manufacturers and analyzing their projects will increase the efficiency of supply chain processes, and will permit the monitoring of project performance,
- Eliminating time, effort and efficiency losses, reducing the waste and unit costs by through improvements in planning and supply processes,

- Reducing material costs in the purchase of raw materials and semi-finished products from existing suppliers and alternative suppliers, preventing risks related to quantity, time and quality that may adversely affect production, increasing cooperation with strategic suppliers,

- Reducing stock costs by controlling raw material and semi-finished stock levels,
- Optimizing logistics activities in terms of value and cost,
- Defining, controlling, monitoring and minimizing the risks for the risk items defined in strategic risks.

To arrange the supply chain activities that are critical to the value chain, Planning Department and Supply Department structures were established within the Planning and Procurement Directorate by a team of experts assigned to this task.



## DIGITAL TRANSFORMATION

We think that technology and digital transformation are our biggest levers in order to be among the companies of the future and to develop sustainability practices at the same time. The digital transformation can contribute significantly to sustainability goals, and especially to energy, time, and resource savings. We also consider and implement projects aimed at improving our processes and saving resources and energy. At this point, it is of great importance to improve the technological infrastructure related to the processes we carry out in our factory, to benefit from the latest technologies and to develop technologies that meet our specific needs.

With our existing infrastructure and know-how, we seek solutions to our own technological needs and the issues we encounter in production, and we see this as an opportunity for digital transformation. In this regard, we continue working to improve SAP efficiency. In the coming period, we aim to maximize efficiency by implementing different modules of SAP.

We conducted continuous improvement initiatives in 2021 to address the areas that potentially cause bottlenecks in our manufacturing processes.

Additionally, after making some analyses for our company's technological integration, it was discovered that laser cutting was the process that needed to be addressed in the factory, therefore this was the area in which we concentrated our efforts.

## HUMAN RESOURCES PRACTICES

Our corporate culture adopts a goal-oriented and forward-looking management approach and values teamwork and success. In order to extend our corporate culture to all our employees, it is our goal as the Human Resources Department to implement HR practices by fusing them with our company culture.

In order to create, develop, and maintain a qualified workforce, as the Human Resources Department, we carry out various HR practices within NUROL Makina such as competency-based hiring process, orientation program to quicken the employees' adaptation to the company and work, performance and competency-based evaluation system, employee-based training programs developed according to the skills, knowledge, and responsibilities of employees, initiatives for technical and personal development and supporting career planning.

## NUROL MAKİNA RISK MANAGEMENT

As NuroL Makina, we consider our sustainable business model to be the key to sustainable growth, which we believe to be possible only through inclusive and effective risk management. In this context, taking a proactive approach and making every relevant stakeholder in the factory aware of the risks and opportunities are prioritized.

Accordingly, the "Risk and Opportunity Management Module" of the in-house software has been restructured and returned to use after being made more user-friendly, while performance-based reports have replaced the previous reports which were based on information. In the field of Risk Management, the necessary analyses have been made and actions have been taken to reduce the average risk score of the company in terms of corporate risks. Accordingly, under our Risk Management System, as defined within the NuroL Makina Risk Policy, we:

- Identify the long-term needs, expectations and situations of our industry, our stakeholders and the geographies in which we operate, and the risks and opportunities arising from all global developments that may affect us,
- Undertake the early detection, systematic reporting and effective management of risk and opportunity factors that may cause deviations in our short-, medium- and long-term goals,
- Evaluate issues that may lead to a conflict of interest through the ethics committee,
- Provide the necessary infrastructure and resources for the management of risks and opportunities,
- Contribute to the continuous and sustainable improvement of our stakeholders,
- Ensure reviews are carried out in line with Management System needs, as well as activities to increase the awareness of the relevant parties.

In recognition of these commitments, the NuroL Makina Risk and Opportunity Evaluation Management approach is based on the management of risks with a preventive or proactive perspective in the light of previous experiences, aiming to make accurate assessments using methods that are in accordance with the applied standards, and to plan countermeasures in line with our strategic goals. This management process, which aims at the assimilation of all level employees and the continuous development of the system, is managed under 5 main headings;

### 1. Corporate Risk and Opportunity Management

Corporate risk and opportunity management, which was launched in 2019 under the leadership of the Strategic Planning and Market Development Directorate, is periodically monitored by the company's senior management and reported to the General Manager by the Strategic Planning and Market Development Directorate.

### 2. Process Risk and Opportunity Management

Risks and opportunities encountered during the carrying out of processes are assessed in terms of probability and potential severity through the Procedure for the Management of Risks and Opportunities in Processes. An Intra-company Process Risk and Opportunity Assessment Software Package is used for the

standardization of risk measurement and assessment parameters and reporting based on a continuity approach. Thus, the risk assessment and monitoring process is managed taking health, safety, environment, business continuity, traceability and sustainability into account.

The Quality Systems Team Leadership coordinates the management of this module and process, which has been standardized for all employees in accordance with the Guidelines for the Utilization of Intra-Company Process Risk and Opportunity Assessment Module Software Package, under the Quality Assurance Directorate.

Risks are periodically reviewed, and the necessary revisions are made, controlled and monitored, taking the changing organizational structure and areas of operation into account. All management organs and departments plan and monitor their counter-measure programs in parallel with the Company Goals. Those efforts are audited by using the Integrated Management System within the plant and independent firms accredited by the Turkish Standard Institute (TSE) and others.

### 3. Occupational Safety Risk Management

In addition to process-based assessments, occupational safety risks that may be encountered in operational processes are managed using the Intra-company Software Package OHS Risk Assessment Module, encompassing all stakeholders.

### 4. Risk Management for Environmental Aspects and Impacts

NuroL Makina is also using the Intra-Company Environmental Aspects and Impacts Assessment Module Software Package for the assessment and control of its own operations and the external operations with which it interacts. Employees are informed of the risks defined by the management through these modules, taking a preventive approach, and the necessary counter-measure and improvement action plans are created.

Issues that need to be taken into account during the process of identifying and monitoring occupational safety and environmental risks have been documented in line with the OHS and Environment Risk Analysis Procedure.

### 5. Project Risk Management

A project-based risk management approach has been introduced under the coordination of the Programs Directorate, and is applied taking into account the Procedure for the Management of Project Risks. The potential risks identified in projects are transmitted to the Programs Directorate via the Project Risk Notification Form.



# #1 GOOD PRACTICES

The evaluation commission, which convened on November 1-5, 2021, at the national level under the chairmanship of the General Directorate of Occupational Health and Safety of the Ministry of Labor and Social Security, selected good practices that will serve as a model to prevent musculoskeletal disorders and help develop future occupational health and safety policies, and FNSS Savunma Sistemleri A.Ş. was qualified to represent Türkiye in the category of workplaces with more than one hundred employees with its "Ergonomic Working at Heights" practice.



European Agency  
for Safety and Health  
at Work

## Shareholding Structure

Institution / Person	Capital Ratio (%)
Nurol Holding INC.	51
BAE Systems Land & ARMAMENTS L.P.	49

## Key Indicators

	2019	2020	2021
Average Number of Employees	1040	968	962
Total Assets (Thousand TRY)	4.238.560	5.322.725	8.181.674
Sales Revenues (Thousand TRY)	2.129.988	1.827.056	1.716.663
EBITDA	317.735	359.399	352.378

FNSS Savunma Sistemleri A.Ş. (FNSS), a joint venture by Nurol Holding A.Ş. (51%) and BAE Systems (49%), is a land defense systems company that designs and manufactures effective, reliable, and cutting-edge tracked and wheeled armored vehicles tailored to specific needs and is regarded one of the global leaders in its field. FNSS, whose products are preferred by users worldwide, has so far delivered thousands of armored combat vehicles to its users. The wide product range developed by FNSS includes tracked armored vehicles in the 15-ton class, medium-weight tanks, 4x4 to 8x8 tactical wheeled armored vehicles, rapid deployable amphibious wet gap crossing system, amphibious armored combat earthmover, and unmanned and autonomous armored ground vehicles.

With the help of its skilled and dynamic workforce, FNSS offers innovative solutions throughout the entire product life cycle, from design to product support. Continuously renewing itself, FNSS not only manages to modernize the vehicles it started producing in 1990 in line with user requirements, but also continues to design and produce new generation manned and unmanned turrets and vehicles that will meet the needs of the modern battlefield. Offering the most innovative, modern, and high-technology solutions to the global market FNSS' KAPLAN product family in tracked vehicles, GÖLGE SÜVARI in unmanned and autonomous ground vehicles, and PARS product family in wheeled vehicles will be the new generation systems that set the standards for future user expectations.

FNSS considers each user's request as a separate project. It takes into account the user's specific demands and develops solutions that are specifically tailored to each user's needs. This is accomplished by FNSS through its expertise in product design and development, flexible processes, and equally adaptable business partners and supply chain. With its innovative solutions, FNSS engineering creates products that address very specific requirements. These platforms are among the most up-to-date examples of FNSS's business model, which comprehends the user and offers user-centered solutions.



## FNSS and SUSTAINABILITY

As one of the strongest brands in the Turkish defense sector in terms of its product development capacity and high R&D capability, FNSS works in line with sectoral dynamics and continues to develop its products under the guidance of the Technology Roadmap. Its corporate strategy, which focuses on high product quality, has been strengthened within the perspective of sustainability in recent years, and its R&D activities have been identified as one of the significant focus areas. FNSS aims to continuously improve the environmental and social performance of both the company and its products through a lifelong perspective, starting with material selection, and extending to the use and disposal phases.

Our sustainability initiatives, which we approach with a long-term view, are centered on minimizing the environmental impact of our products, especially throughout the usage phase, and we incorporate this strategy into our R&D activities.

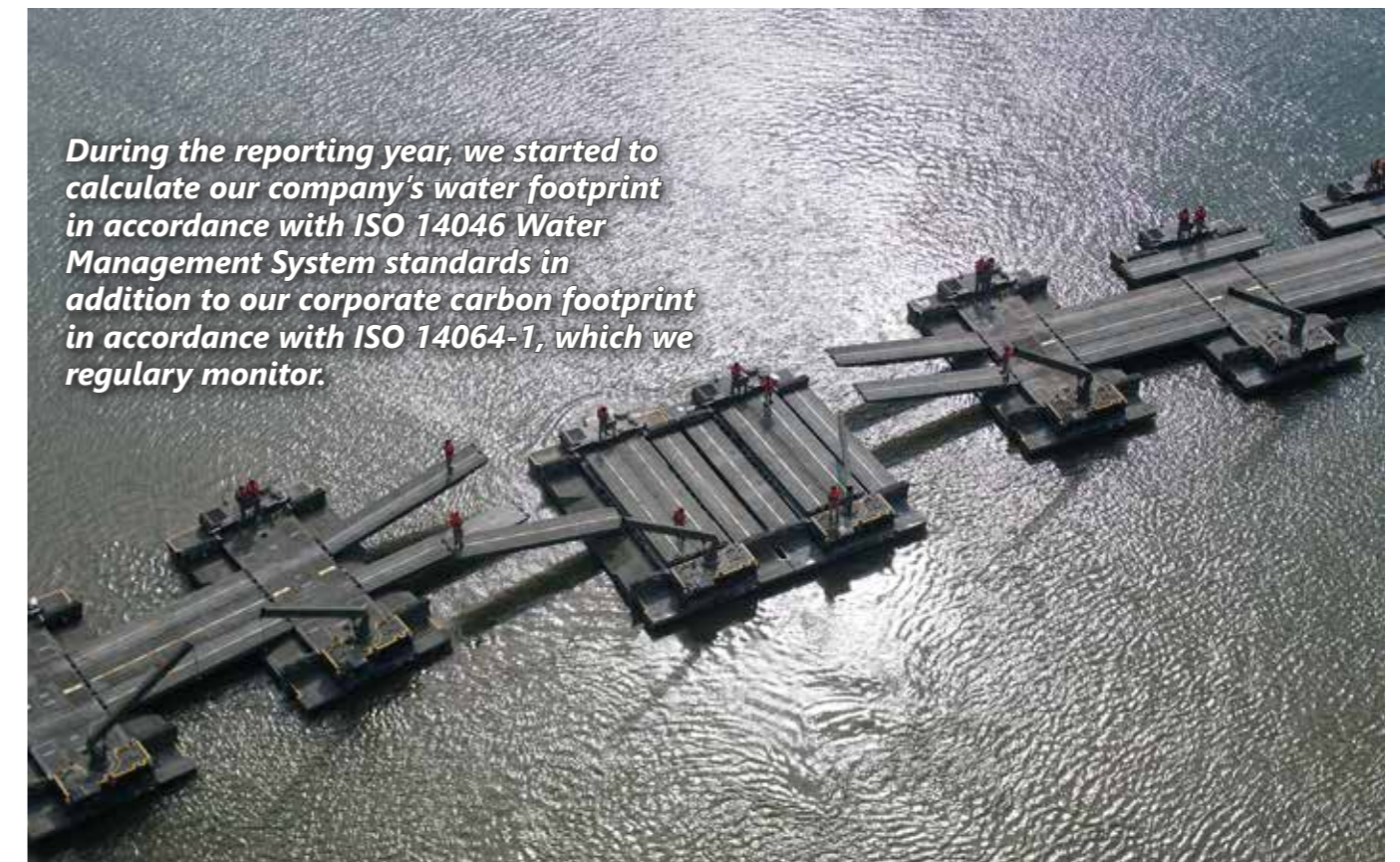
In addition to our corporate carbon footprint calculation according to ISO 14064-1 requirements, which we regularly monitor, we started to calculate our water footprint in accordance with ISO 14046 Water Management System in this reporting period. Based on the data we obtained, we set our improvement targets and defined our action plans to achieve such targets.

In addition, the necessary efforts have been started to ensure that these action plans, which were defined to progress in accordance with the continuous

improvement perspective strategy that forms the basis of sustainability development, continue with the evaluation of the environmental impact of our products. In 2021, all activities carried out within FNSS regarding sustainability were reviewed, and the links between these activities and the United Nations Sustainable Development Goals were evaluated. After a comprehensive study, it was decided to consider sustainability as a separate heading in our new 5-year Strategic Plan and to perform the necessary work to monitor all the initiatives carried out as part of the relevant goals.

## DIALOG WITH OUR STAKEHOLDERS

Stakeholder communication is one of the most important issues for FNSS, which acts in accordance with the mission of "Protecting our users and all our stakeholders and adding value through creative solutions." We define all our stakeholders with whom we interact directly or indirectly due to our activities within our value chain, and we define a regular communication channel. The feedback and suggestions received from our communications is used to increasing the quality of our products and services. As FNSS, our stakeholder analyses also form the basis of our "Strategic Plan Situation Analysis," and the results of those studies shape our business and sustainability strategies.



*During the reporting year, we started to calculate our company's water footprint in accordance with ISO 14046 Water Management System standards in addition to our corporate carbon footprint in accordance with ISO 14064-1, which we regularly monitor.*

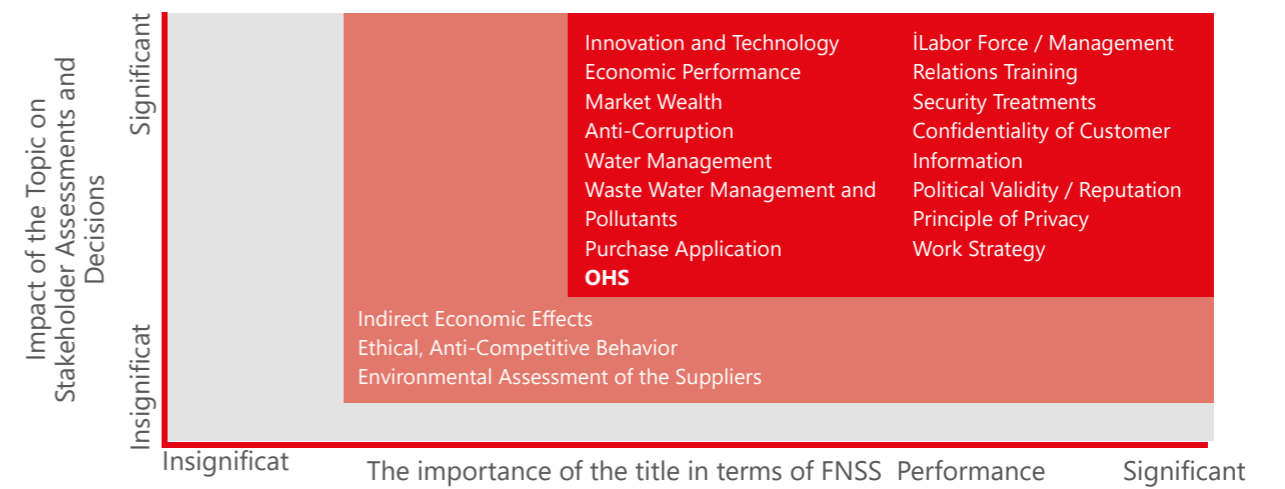


STAKEHOLDERS	Frequency of Communication	OUR CHANNELS OF COMMUNICATION
CUSTOMER (Procurement Authorities + End-User) (We operate by the army of the Related country, Ministry of Defense, Ministries of Finance the Related Country, Middle East and Asia)	As required	Business improvement meetings and visits, all project activities, tests, fairs, end-user trainings, drills, customer satisfaction surveys
PARTNERS/SHAREHOLDERS (Nurol Holding AND BAE Systems)	As required	Meetings of the board of directors, FNSS Interim Report, project-related events
EMPLOYEES A company with high employee engagement	Meetings of the board of directors four times a year	Monthly employee meetings, Management Review Meetings, Project Review Meetings, All Employee Meetings, FNSS "Bizden Haberler" Magazine, social activities, intranet and website, employee satisfaction and loyalty surveys, FNSS brand perception surveys, trainings, informative e-mails
SUPPLIERS (SUBCONTRACTORS)	Continuous	Supplier visits and audits, supplier development activities and EYDEP studies, events organized for suppliers, such as "Supplier Days" etc., joint development activities with suppliers within projects, supplier portal
LEGAL AUTHORITY / LEGISLATURES	Continuous	Project reports and offers, visits and meetings, Defense Industry Fairs, congresses, forums and seminars, SASAD, DEİK, IMMIB etc. subscriptions
OTHER DEFENSE COMPANIES	As required	
COMPETITORS	As required	
UNIVERSITIES	As required	Programs such as SAYP etc., R&D projects, career days, internship programs, graduation projects, collaborations with university clubs and student representatives
MEDIA	As required	Press conferences, magazine interviews, social media networks, fairs
Press conferences, magazine interviews, social media networks, fairs NGOs	Continuous	FNSS website, Mil-Design Contest, participation in seminars, NGO memberships, donations and sponsorships
NGOs	Continuous	FNSS website, Mil-Design Contest, participation in seminars, NGO memberships, donations and sponsorships

### OUR PRIORITIES

We defined our priority issues to act with the proper planning as part of sustainable business management. The identified priority issues were analyzed in line with the needs and expectations of our stakeholders. According to the "Priority Matrix" presented on the next page, our top priorities as an organization are employee/management relations, training, security practices, confidentiality of customer information, policy validity, confidentiality principle, and business strategy.

### PRIORITIZATION MATRIX



FNSS has determined its strategic approach and management model in accordance with the results of a priority analysis. At this point, we have put the most effort into the development of our corporate strategy and our sustainability goal, as well as our technology strategy, which is critical for our sector, in harmony with each other in a way to move towards the same objective.

The strategy determined as "to make the organization's overall value greater than the sum of its individual components." is supported by its strong technological infrastructure, R&D, and product portfolio strategy.

A technology roadmap is determined for all projects. Technologies are selected and prioritized in order to develop the product requested by the customer with appropriate features. This effort is significant for long-term success in a dynamic sector with many variables, such as the defense industry.

One of the most important issues for FNSS is the knowhow gained within the organization thanks to its qualified employees, and its transfer to the product. Within this context, in-house workshops are organized for the determination of the technology roadmap. Such workshops are planned for specific markets, product specifications, technology breakdowns, and for final roadmaps.

Connection between corporate company strategy, R&D strategy, and sustainability goals, as well as rapid adaptation to new technologies can be defined as workshop outputs. The technology roadmap links all R&D projects to the milestones of contracted projects and target projects in the corporate business plan, and as a result of this connection, the company's corporate strategy and R&D goals become more aligned.

The required technology investments, technology prioritization, short- and medium-term R&D strategies and action plans, identification of internal competencies to be developed, and strategic decisions regarding technology development partnerships are all determined through technology road mapping.

**One of our sustainability goals is to adopt the eco-design practices developing around the world, and to evaluate environmental impacts during the product development phase of projects with a life-long assessment approach.**

At this point, trying different design alternatives and efforts to produce in a better environmental performance and quality performance is a clear indicator of FNSS' strong R&D infrastructure.

Confidentiality is an issue to which FNSS attaches considerable importance in all aspects. In addition to protecting the confidentiality of company and customer information, it also pays attention to protecting the privacy of the personal data of its stakeholders (including company employees, representatives, consultants, suppliers, solution partners, and members of the Board of Directors).

As a company serving the defense industry, we are aware of the importance of the confidentiality of customer, company, and stakeholder information, and we act accordingly while achieving our goals. We share information with third parties in compliance with our "NATO Facility Security Clearance Certificate" and the "Personal Security Certificate" of our employees and the following issues.

- Even if the validity period of the confidentiality agreements signed with the stakeholders expires, information that is classified and disclosed in accordance with the provisions of the agreement is preserved by the parties.
- FNSS was granted its ISO/IEC 27001:2013 certificate on December 2, 2016. All administrative and technical requirements have been met to ensure full compliance with the requirements of the standard since the date of certification.
- In order to ensure the continuity of the Information Security Management System and to keep the applications up to date, an "Information Security Committee" has been established consisting of company employees. Necessary efforts regarding information security, the measures to be taken and the evaluation of violations are all carried out by this committee.
- The importance of confidentiality is stressed as a priority during the orientation training given to new employees. In addition, awareness training is provided annually via e-learning methods.
- The documents to be shared with stakeholders are classified according to their confidentiality; archiving, disclosure, and destruction methods of these documents are identified, and actions are taken in line with these procedures.
- Information and documents are disclosed on a need-to-know basis and destroyed at the end of specific periods. The necessary actions are taken for information/documents stored electronically.
- FNSS receives consultancy services within the scope of its harmonization with Personal Data Protection Law No. 6698 and aims to develop its practices in this direction.



## FNSS AND ENVIRONMENTAL SENSITIVITY

FNSS looks at all its activities from an OHS and environmental management perspective and realizes improvements and manages these two areas in an integrated manner.

We have launched efforts to minimize our environmental footprint, primarily by including all our in-house activities. The status of the company's carbon and water footprint is regularly monitored. Acting within a life-long perspective, we have started to make plans on reducing our environmental footprint in terms of raw materials and products.

During the design of the new production process, we first analyze their impact on the environment and any possible risks that may occur. If we notice any environmental risks as a result of those analyses, we develop action plans in order to prevent or minimize them.

All our processes are conducted in line with our environmental policy: we commit to reduce natural resource consumption, increase resource efficiency, and prevent environmental pollution. To ensure the continuity of this approach, we organize environmental training for our employees every year on a regular basis.

Training Courses on Environmental Issues	Total Training (man hours)			Employee Training (man hours)		
	2019	2020	2021	2019	2020	2021
Training Courses on the Environment	701	450	600	1	0,7	0,60
General Training	56.952	18.712,5	28.289,92	54,34	19	32,63

\*Training hours have decreased due to the Covid-19 pandemic.

## ENERGY AND EMISSIONS MANAGEMENT

Taking a lifelong perspective in its operations, FNSS has started to monitor the environmental impact of its activities under sub-categories. FNSS manages the majority of its total environmental impact through energy and greenhouse gas management, and the company tries to raise awareness throughout the value chain. We believe that measuring and monitoring energy consumption under sub-categories within the organization is of great importance in terms of the effectiveness of energy management and determining actions to lower energy density.

In 2021, we expanded the scope of the PLC-SCADA system to increase the efficiency of energy consumption tracking and monitoring. We keep working to create relevant reporting and monitoring modules.

Increasing the share of renewable energy use is one of the most important aspects in energy and emissions management. In addition to the 60-kW solar energy system installed in 2019, the electricity generated

from solar energy was doubled with the installation of an additional 60-kW solar energy system in 2020. This electricity generated was used for the internal consumption of the facility. To expand the share of renewable energy use, efforts are underway to increase the existing 120-kW solar energy system.

In order to increase energy efficiency and reduce energy loss, we have replaced electric fire pumps with more efficient models, ventilation systems in some buildings with more efficient models, and expanded the capacity of natural gas RMS stations to meet potential requirements.

**The emissions measurement, which must be carried out every two years in accordance with the Regulation on the Control of Industrial Air Pollution, was completed in 2021. According to the analysis report, no metrics exceeding the applicable limits were found.**

FNSS	2019	2020	2021
<b>In-house Energy Consumption (GJ)</b>			
<b>Fuel</b>			
Natural Gas	32.291,35	33.638,11	41.881,01
Diesel	10.006,29	8.705,51	3.810,28
<b>Electricity</b>			
Electricity from the Grid	21.194,00	21.754,61	25.602,46
Electricity from the Solar Energy	135,75	339,07	650,89
<b>Total Energy Consumption</b>	<b>63.627,61</b>	<b>64.437,47</b>	<b>71.293,75</b>

***In terms of emissions management, our goal is to adopt corporate carbon footprint management practices in line with ISO 14064-1.***

FNSS	2019	2020	2021
<b>GHG Emissions</b>			
Scope 1	2.241	2.544	3.008
Scope 2	2.690	2.752	3.292
<b>Total Emission</b>	<b>4.931</b>	<b>5.296</b>	<b>6.300</b>

## WATER MANAGEMENT

Efficient use of clean water resources has become even more important due to climate change. As part of its environmental management initiatives, FNSS continuously monitors its statistics on the use of water resources. In order to evaluate the impact of the facility on the relevant water basin and to fulfill its responsibility towards stakeholders, the water footprint of the facility was calculated for the first time in 2020 and a system infrastructure was established to monitor water consumption in detail. All water-consuming points within the facility were identified and meters were installed at these points for detailed consumption monitoring.

There are two biological and one chemical wastewater treatment plants within the facility to ensure that the wastewater can be discharged to the receiving environment. In order to protect the groundwater and surface water sources and prevent water pollution, samples are taken from the wastewater treatment plants at specified periods and the discharge water is checked for compliance with the Water Pollution Control Regulation. Values from wastewater analysis are satisfactory in terms of the discharge criteria specified by regulations.

FNSS	2020	2021
<b>Water Footprint</b>		
Blue Water Footprint	89.284	91.380
Gray Water Footprint	6.983	7.142
Green Water Footprint	0	0
<b>Total (m<sup>3</sup>/year)</b>	<b>96.267</b>	<b>98.522</b>

FNSS	2019	2020	2021
<b>Amount of Water Used</b>			
Well Water (m <sup>3</sup> )	71.400	89.212	91.380
Municipal Water (m <sup>3</sup> )	-	-	-
<b>Total Amount of Water Used (m<sup>3</sup>)</b>	<b>71.400</b>	<b>89.212</b>	<b>91.380</b>
<b>Amount of Wastewater Discharged Annually</b>			
Recipient Environment (m <sup>3</sup> )	40.320	12.521	14.804
<b>Wastewater Channel (m<sup>3</sup>)</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Recovered Water (m<sup>3</sup>)</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	<b>40.320</b>	<b>12.521</b>	<b>14.804</b>



## WASTE MANAGEMENT

According to the waste management actions implemented within the organization based on the waste hierarchy, hazardous wastes generated at the plant are segregated on-site in accordance with the principles of the Waste Management Regulation, kept in the temporary waste storage area, and sent to licensed facilities for recycling/disposal processes. The shipment of hazardous wastes is managed through the online MoTAT application of the Ministry of Environment, Urbanization and Climate Change and is carried out in accordance with ADR obligations. Waste batteries are sent to the authorized association (TAP), while waste industrial/vegetable oils are sent to authorized recovery companies as per their specified categories.

Non-hazardous wastes are collected and stored separately from hazardous waste and are sent to recycling companies.

In accordance with the waste hierarchy, avoidance/reduction of waste generation is considered first, followed by reuse and recycling alternatives. At this point, necessary precautions are taken to segregate waste in accordance with the zero-waste system. Company employees are informed both through on-the-job

training and environmental awareness training organized throughout the year.

Several initiatives to ensure efficiency in manufacturing processes have been developed. In this regard, for example by digitizing the work instructions utilized in manufacturing, efficiency was achieved in terms of cost, work speed, and paper consumption.



FNSS	2021
Total Quantity of Non-hazardous Waste	749,5
Total Quantity of Hazardous Waste	210

## OCCUPATIONAL HEALTH AND SAFETY PRINCIPLES

Activities related to occupational health and safety, which are essential for sustainability, are addressed holistically within the framework of fostering well-being. In this direction, it is aimed to contribute to a healthier society by safeguarding and improving the well-being of not only the employees but also of all stakeholders.

A proactive approach is the key input of continuous improvement-oriented efforts, and this is achieved through risk and opportunity management. Identifying occupational health and safety risks and opportunities in all processes and raising awareness on this issue are amongst the main activities.

Continuous improvement initiatives continue uninterrupted through awareness raising, setting individual OHS targets, ensuring high employee engagement through various and reinforced communication channels.

In order to obtain the opinions of employees, the participation of many employees in the Corona Emergency Team, the food committee, and during personal protective equipment selections was ensured.

The development of effective and visible leadership in the field of OHS was also ensured through Functional Status Review Meetings. In addition, effective leadership was demonstrated through OHS improvement initiatives defined for each directorate.

**Adopting a risk-based occupational health and safety approach to maximize the safety of the working environment beyond legal requirements, FNSS has been managing OHS issues in a holistic and comprehensive manner under the leadership of its senior management and with the participation of all employees since its establishment.**

All employees receive Behavior-Focused Risk Management Training along with fundamental OHS Training, and teams of volunteer employees reinforce safe behavior at the workplace through observations of unsafe behavior and immediate feedback. Frequently observed unsafe behaviors are reported to senior management and comprehensive studies are conducted.

In 2005, FNSS obtained OHSAS 18001 certification for its occupational health and safety management system. It thereafter became one of the first companies in the military industry to achieve compliance with the ISO 45001:2018 standard, which superseded it, in 2019.

The FNSS Health Unit continues to provide primary healthcare services and initiatives to enhance employee well-being in addition to its efforts to reduce occupational risks. It continues to offer advice and support to employees on these matters and arranges a variety of training programs and campaigns on subjects like healthy eating and physical exercise.

The Avita - Employee Support Program helps employees access all types of information by phone and receive appropriate guidance on health-related issues, both of which improve well-being.

Numerous managerial and operational improvements were realized during the reporting period, such as designing/arranging workplaces, taking risks under control by designing new protective systems with engineering measures, increasing accessibility and traceability through digitalization, organizing training to improve awareness and professional skills, and motivational activities to strengthen social and mental well-being.

OHS Training Courses	Total Training (man hours)			Employee Training (man hours)		
	2019	2020	2021	2019	2020	2021
OHS Training	19.809	17.963,7	19.509	19,14	18,6	20,7
General Training	56.952	18.712,5	37.490	54,34	19	39,8

Total Number of Accidents, Frequency, and Weight Ratio	Number of accidents			Total Frequency of Accidents			Weighted Ratio of Accidents			Total Working Hours		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
FNSS	17	34	23	1,75	3,88	2,44	17,69	38,8	20,1	1.944.367	1.747.448	1.858.250

### Occupational Health and Safety Risk Management:

Our fundamental tenet at FNSS is to manage occupational health and safety hazards considering applicable regulations and standards. Risk assessments are conducted for all activities and involve all relevant parties, as well as risk assessment teams, the composition of which may change depending on the activity. The stages of identifying the risk sources that are present or may emerge prior to, during, and/or after the activities, analyzing the regulations and/or standards pertinent to this risk source, and calculating the risks are followed in the risk assessment process.

The Fine & Kinney Method is used for mathematical modeling of identified risks. Probability (probability of harm), Severity (estimated harm to humans), Frequency (repetition of exposure to hazard over time) values are selected from a table and the overall risk value is calculated by multiplying the values of these components, and the risk score is found. However, regardless of the risk score, if the severity value is 40 and above, necessary precautions are planned.

## FNSS WILL REPRESENT OUR COUNTRY IN EUROPE WITH ITS OCCUPATIONAL SAFETY PRACTICES

FNSS participated in the good practices competition organized by the European Agency for Occupational Health and Safety (EU OSHA) within the framework of OHS practices and as part of the **“Healthy Workplaces Lighten the Load: Musculoskeletal Disorders”** campaign, with its **“Ergonomic Working at Heights”** application, which it prepared with robust engineering measures to improve the ergonomics and safety of working at heights.

The evaluation commission, which convened on November 1-5, 2021, at the national level under the chairmanship of the General Directorate of Occupational Health and Safety of the Ministry of Labor and Social Security, selected good practices that will serve as a model to prevent musculoskeletal disorders and help develop future occupational health and safety policies, and FNSS Savunma Sistemleri A.Ş. was qualified to represent Türkiye in the category of workplaces with more than one hundred employees with its **“Ergonomic Working at Heights”** practice.





## FNSS AND VALUE CHAIN MANAGEMENT

To implement our sustainability strategy and make our value chain a part of it, one of the first steps taken was to reveal our sphere of influence in detail and to identify the stakeholder groups with whom we are engaged in. Our interactions with our suppliers are particularly important in this context since they are closely related to our business strategy. Defining common goals with our suppliers with whom we cooperate and acting in accordance with these goals are critical for all processes. We manage supplier management by defining it under several different headings. We define and manage our suppliers under several headings.

### Current Supply Chain Management:

As a leading company in the design and production of tracked and wheeled armored vehicle families and weapon systems for the Turkish Armed Forces and those of allied nations, the first link in our FNSS value chain is the supply of raw materials, other services, and goods.

As in all stages of our value chain, security is among the main issues prioritized in the supply chain. Furthermore, environmental, social, and ethical matters are among the other issues evaluated alongside quality. Supply chain management plays an important role in the dissemination of responsible production and consumption practices, in line with the Sustainable Development Goals. We manage our supply chain through the Supplier Portal that we have established, ensuring transparent, fast, and accurate purchasing processes, and we aim to continuously improve our existing suppliers and add new companies that comply with FNSS' values to our portfolio.

### New Supplier Selection Process:

As the Supply Chain Directorate, the new supplier selection process begins with the referral of companies that have applied to work with FNSS or that we have found suitable as a result of a company research, to the Quality Department. For new suppliers, the Quality Department

examines the subcontractor and sub-industry company information form provided by the company. If the preliminary evaluation is positive, it is decided to carry out an inspection and evaluation of the company, as the next step, prior to approving the company as a supplier. Failure at this stage leads to a new search for an alternative supplier. For existing suppliers, the inspection and evaluation process is initiated directly, without the need for a subcontractor and sub-industry company information form. After undergoing an inspection and evaluation, an Inspection Score is determined for the company. Suppliers are classified according to their Inspection Scores.

If there are any findings detected, a corrective action report is sent to the company for remedy. If a supplier fails to correct the nonconformity after receiving a second corrective action report, it may be decided to cease/not enter a commercial relationship with such company. Delivery Scores are monitored for companies with which we have started or continue to maintain a commercial relationship.

Quantitative Supplier Performance Evaluation System: For FNSS, there are two main variables used to measure the quality performance of a supplier. One is their inspection score, and the other is their delivery score, the weighting of which is determined. The reasons of parts

being rejected are categorized and standardized. All these variables are assessed with a mathematical formula that is used to determine the overall performance of the supplier. The formula has been fully integrated into the Industrial Finance Systems (IFS) by our IT Department. The formula quantitatively and continuously evaluates supplier performance as a highly comprehensive tool.

### Supplier Development/Improvement Efforts:

The Supply Chain Directorate focuses on the cooperation established with suppliers, which is based on a common goal and understanding, and a framework of mutual trust. In line with this vision, it continued its efforts to improve the infrastructure and technical competence of its suppliers in 2021, and employees of the department visited many suppliers to offer them support to this end.

FNSS considers supplier training to be one of the most important aspects in supplier development. In line with this understanding, suppliers are informed on many issues, and in addition to general information, we provide collective training to our companies from time to time as needed, and provide them with information, supported by the design, production, and quality departments, during our company visits.

### Meetings with Companies:

We follow the rejected parts of the products we receive from our suppliers as part of our quality process and contact companies individually. As in previous years, we brought companies with high rejection rates together with our Quality Department to discuss the reasons for rejection and to give them our improvement suggestions, leading to considerable improvements.

### Supplier Portal:

After placing an order, transactions with suppliers can be carried out over IFS, the FNSS Enterprise Resource Planning program. The portal hosts the necessary tools for the follow-up and realization of the shipment, quality control, invoicing, and payment processes of the suppliers. This system also allows our suppliers to send their requests for changes in the "Technical Documents" related to their orders to FNSS in a controlled environment. This allows our suppliers to contribute to "Design & Development" activities.



# #1 GOOD PRACTICES

By integrating our Near Miss and Hazard Notifications to the digital environment, authorized persons were informed so that prompt action could be taken. With the module integrated into the QDMS system, we created a process in which our employees' awareness of the near misses and hazardous conditions they encounter in all our facilities is raised.



### Shareholding Structure

Institution / Person	Capital Ratio (%)
Nurol Holding INC.	99,83
The Çarmıklı Family	0,17

### Key Indicators

	2019	2020	2021
Average Number of Employees	130	259	316
Total Assets (Thousand TRY)	610.864	980.115	1.194.458
Sales Revenues (Thousand TRY)	154.273	180.379	534.597
EBITDA (Thousand TRY)	61.320	-1.775	246.209

Nurol Teknoloji is a Nurol Holding company founded with entirely domestic capital in 2008 to produce advanced technology ballistic ceramics. Since its establishment, it has placed a high priority on research and development and has been working to fill a significant gap in the field of ballistic protection solutions, which is needed by our country and all friendly and allied countries. It designs, develops, and manufactures advanced ballistic armor solutions in three production facilities located in Ankara with the expertise and experience of Turkish engineers, with no assistance from any foreign partners or consultants.

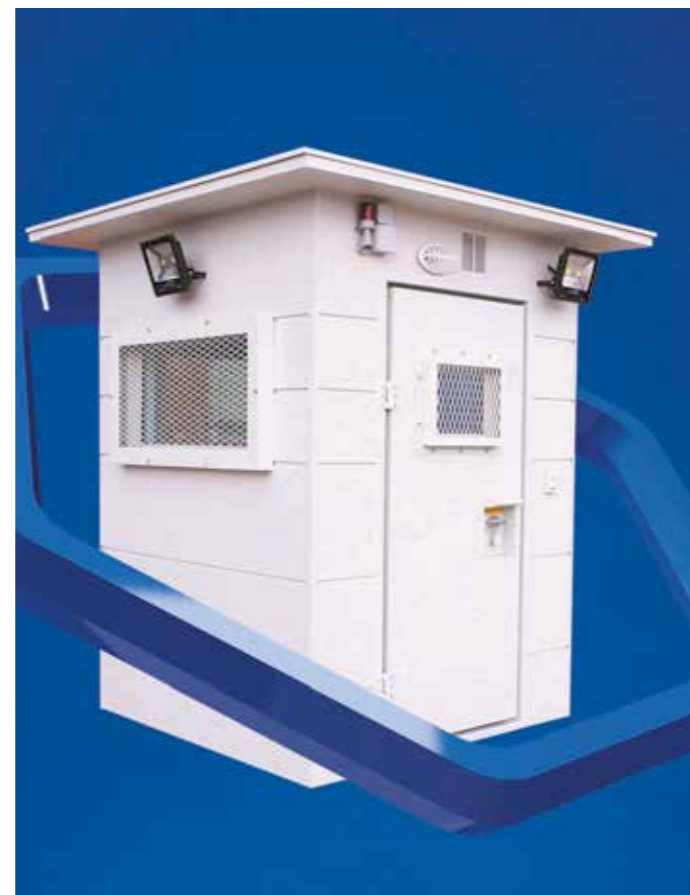
Having invested more than \$130 million since its establishment, our company has the capability to produce ballistic ceramics such as Boron Carbide, Silicon Carbide, Alumina, Titanium Diboride, Tungsten Carbide, which can be produced in only a few countries in the world, from raw materials to the final product, which is the armor solution, under a single roof. In addition, our company has the capacity to develop and offer ballistic composite solutions and hybrid ballistic solution alternatives of its own design in accordance with customer requirements.

Offering reliable and cost-effective ballistic protection solutions qualified by international standards with its unique powders/processes and exporting them worldwide, Nurol Teknoloji has also developed, produced, and delivered personal protection products such as ballistic protective plates, vests, and ballistic protection shields required by our security forces in our country. In addition to the aforementioned products, which are in active use by our security forces and have proven themselves on the battlefield, Nurol Teknoloji is able to produce cost-effective and lightweight solution options and high-value solutions for platforms, up to the highest ballistic protection levels in accordance with international standards and qualify them in its own accredited laboratories. Additionally, as part of structural armoring, cost-effective ballistic protection

armoring activities are carried out for structures/products such as strategic buildings, security cabins, portable containers, shields, and trailers. With its advanced survival system solutions, it develops and offers Modular Blockhouse products that provide high protection with rapid installation at road control points and bases, Shelter products for Unmanned Aerial Vehicle Command and Control, and multi-purpose armored container products that meet user requirements at the highest level with various system integrations.

In addition to defense products, our company also serves the manufacturing and mining industries with ceramic wear plates and crusher rotor products. Accordingly, our company increases its domestic and global market share of crusher rotor bits used in the mining industry and wear plates produced from ceramics with high abrasion resistance.

Nurol Teknoloji holds 'NATIONAL SECURITY CERTIFICATE' from the Ministry of National Defense and 'NATO SECURITY CLEARANCE CERTIFICATE', as well as ISO 9001, ISO 14001, and OHSAS 18001 system certifications. It has an advanced machinery park, quality infrastructure, and two accredited ballistic laboratories with 17025 TURKAK and NIJ accreditation. In addition to these, Nurol Teknoloji, which keeps R&D and quality at its core thanks to its know-how, has the 1245th R&D Center in Türkiye, which was registered by the Ministry of Industry and Technology on January 25, 2021.





## NUROL TEKNOLOJİ AND SUSTAINABILITY

As Nuro Teknoloji, we aim to contribute to society and all our stakeholders in the value chain through the minimum environmental impact while providing maximum economic benefit through our activities. Beyond our production and technology development vision, we have adopted a lifelong perspective for the products we have produced and their features, and act with a sense of responsibility in the direction of the product.

We are aware that ballistic protection products, for which Nuro Teknoloji is directly responsible as a manufacturer, have a vital impact on the safety of the personnel who use them, security forces, and their families, in short, the security of society.

For this reason, while establishing our acceptance criteria, we take into account the needs and expectations of critical stakeholders in our value chain. As a company that provides services to the defense sector, we oversee our manufacturing processes with the understanding that every product we produce has the potential to save lives, and as a result, has high security responsibility.

In all our projects, in addition to the production and technical aspects of the work, social and societal impacts are also conveyed to all stakeholders in the most effective way through internal and external training programs.

With protective armor solutions and advanced technological ceramics produced entirely domestically and nationally, it is aimed to improve the armor systems currently used, to integrate armor systems into personnel protection, vehicle protection and structural protection platforms, and to produce ballistic products that offer value to the user by providing low weight and high protection.

With our innovative production capabilities under the control of our sustainable quality systems, we contribute to the economic network in the defense industry with our high local content rate, by ensuring the protection of our domestic resources and our security forces.

Thus, we prevent the country's capital from being used for foreign purchases and ensure the information and infrastructure support in our country for the supply of the right systems and products.

In this technology development journey, we will always continue to contribute to the development of the country's economy and defense industry by sharing all the developments with our stakeholders, raising awareness on ballistic products, and increasing the level of knowledge.



## DIALOG WITH OUR STAKEHOLDERS

As a domestic and national armor manufacturer, Nuro Teknoloji has become a leading company in our country in the field of armor technologies and armor production through its activities in the sector, in which it plays a leading role in terms of its technological development, continuous R&D efforts, continuous improvement and development activities. While all research, development, and production activities are carried out, stakeholders with whom frequently interacts are defined. Aside from those who are directly affected by our products and activities, we interact with some of our stakeholders indirectly. In both cases, our communication channels, and the frequency of communication with all our stakeholders have been determined, and the needs and expectations of those with whom we maintain a high level of interaction have been taken into consideration when establishing our sustainability strategy.

Nuro Teknoloji acts with the vision of keeping up with technological developments in this rapidly developing and expanding global economy and sector, with the aim becoming a technology producing company. It evaluates customer demands and requests regarding its products as a priority, and is committed to the development of new technologies, new products and formulas, new armor systems and new solutions for its stakeholders. To this end, it seeks to develop its supply chain, and shares its developments and achievements with sub-industries and other stakeholders to support them in the development of their technological and economic infrastructures.

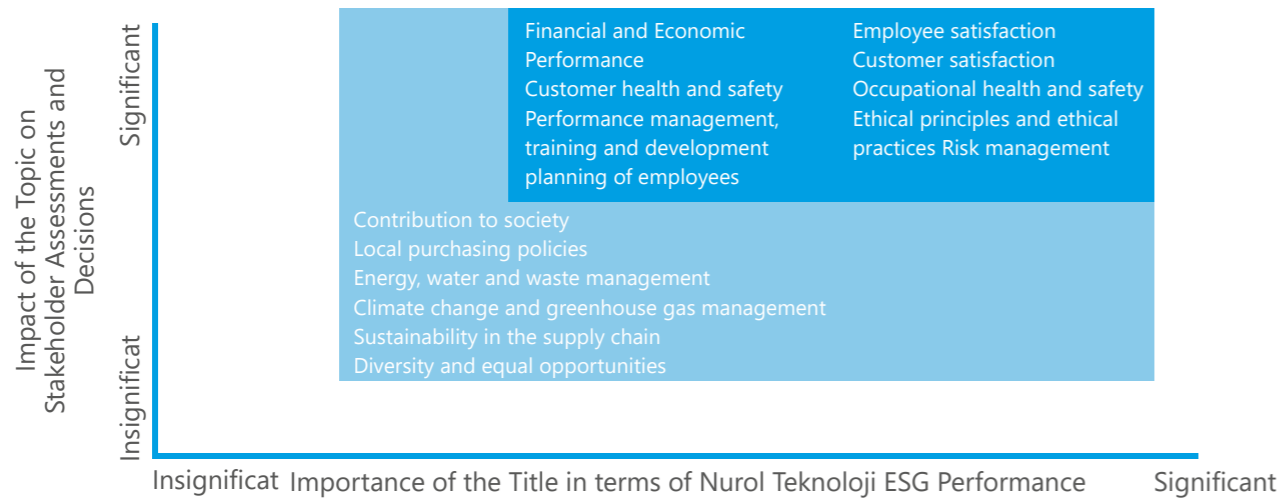
We consider the feedback, suggestions, and recommendations we receive through our communication with our stakeholders as an opportunity for development. We have defined the frequency of dialogues with our stakeholders and the platforms to be communicated for the continuity of this communication.

Target Group	Participation Means/Method	Timing/frequency during commissioning and operation
Legislative and Regulatory Bodies	Visits and dialog, Annual Reports, corporate website, congresses and seminars, joint projects developed	When necessary
Shareholders	Meetings of the Board of Directors, General Assembly Meetings, Company Performance Meetings, Annual Reports	Annually, once every 3 months, when necessary
Financial Institutions	Visits and dialog, Annual Reports, IFRS audit reports, company performance reports, corporate website	Annually, every 6 months, when necessary
Rivals	Seminars, fairs, congresses, industry association meetings, Annual Report, corporate web page	Annually, when necessary
Customers	Meetings, congresses, seminars, fairs, corporate website, Annual Report	When necessary
Employees	Trainings, social events, World of Nuro	magazine, Intranet, Internal communication, materials, Annually, every 6 months, when necessary
Society	Annual Reports, corporate web page, social media, corporate social responsibility projects, sponsorships	Annually, monthly, when necessary
Media	Press releases, interviews, Annual Reports, corporate web page, social media, corporate social responsibility projects, sponsorships, World of Nuro magazine, advertisements	Annually, monthly, when necessary
Group Companies	Meetings, congresses, seminars, fairs, corporate website, Annual Report, World of Nuro magazine, Nuro Holding activities	When necessary
Subcontractors	Meetings, congresses, seminars, fairs, corporate website, annual report, company facilities	When necessary
Business Partners	Meetings, seminars, trainings, fairs, congresses	When necessary
Suppliers	Meetings, offers, contracts	Annually, when necessary
College	Seminars, trainings, fairs, congresses, corporate website, joint projects developed, career days	When necessary

## OUR PRIORITIES

Nuro Teknoloji continues its efforts by focusing on the determination of an effective sustainability roadmap through a prioritization analysis and has defined important issues for the senior management while focused on the needs and expectations of stakeholders. Our priority issues were determined during the "Stakeholder Analysis and Prioritization" workshop we organized and are presented in the table below.

## PRIORITIZATION MATRIX



While the most important achievement for NuroL Teknoloji and its stakeholders has been defined as financial and economic performance, we as a company are aware that this is the R&D investments we are making and therefore the customer satisfaction we will provide.

As we move forward on this path, we recognize that one of our most important assets is the intellectual capital of our employees. NuroL Teknoloji has therefore defined effective employee performance management and learning and development planning among its priority issues. It is important to organize social events, to strengthen communication, to evaluate employee satisfaction, to support teamwork, to provide appropriate working conditions in line with the company culture, to encourage success with rewards, and to implement practices that increase satisfaction. Increasing the technical and social knowledge of our employees, allowing them to use their initiative and raising their personal development levels will help them find the most effective solution in projects. Each of our new employees receives orientation training. Performance management, professional training and development plans of employees are made by their managers.

In 2020, it was aimed to increase employee productivity and loyalty with the coordination of the Human Resources Department. Continuous learning and performance evaluation is intended to be more effective in the ongoing process. It has become a company that places high value on gender equality in all areas and creates jobs accordingly. In every product it develops and manufactures, it has supported and supervised its own personnel as well as the sub-industry organizations from which it receives support and has instilled the principle of human rights and equality that it has adopted in all the institutions it works with.

NUROL's corporate identity is reinforced by its employees' commitment to the corporate culture and ethical values, in line with the NUROL Holding Circulars and Regulations.

Among our priority values are integrity, respect, employee rights, occupational health and safety, customer satisfaction, environmental consciousness, high quality products, training, fighting against corruption, national capabilities, and domestic production.

Since NuroL Teknoloji produces Ballistic Armor Solutions, Customer Health and Safety is an extremely important issue. Similarly, the most important factor that will create customer satisfaction is ensuring customer health and safety, and the quality of our products. This issue is managed under two main headings, as Raw Material Input Quality Control and Design Phase in NuroL Teknoloji. Since our products are intended directly to the end user, they must be supplied flawlessly.

Therefore, all production stages are carried out meticulously, and national and international regulations are followed. In addition, the health and safety of the workers involved in production is also an issue that needs to be evaluated. National and international health and safety regulations are followed in the Raw Material Input Quality Control processes, and our suppliers are monitored to ensure their compliance with the relevant legislation.

Since our products are used in different geographical locations and under various conditions, they are open to continuous improvement and development. The R&D department, therefore, constantly monitors the existing market, examines new raw materials and product alternatives, and carries out projects with suppliers accordingly. Our personal protective equipment products are worn or carried by users. The fact that our products are suitable for body ergonomics and are lightweight makes them suitable for very different terrains and long-term use, which increases the need for R&D.

## NUROL TEKNOLOJİ AND ENVIRONMENTAL SENSITIVITY

Within the framework of our sustainability approach, we minimize the amount of waste generated from our production activities and continue our efforts to reduce our environmental impact by controlling the use of natural resources. We monitor the use of energy and water resources that we need throughout our production phase and implement improvement measures to reduce the waste generated throughout the process with zero waste awareness. For the temporary storage and disposal of our wastes, we minimize their environmental impact in accordance with legal regulations with a more environmentally friendly approach.

As NuroL Teknoloji, we ensure that our emission values are within the legal limit values with consideration for global warming and climate change through air emission measurements and we carry out improvement activities for its continuity. We monitor our activities, which we carry out by minimizing the consumption of natural resources, with the ISO 14001:2015 environmental quality management system.

Courses (man.hours)	2019	2020	2021
Training Courses on the Environment	0,2	2,5	2,5
General Training	25,11	32,5	37,96

## ENERGY MANAGEMENT

In addition to performing defense industry-related activities in our country, we also contribute to the dissemination of alternative energy sources through our experience in the installation of solar energy systems. We prefer to use renewable resources and closed-loop systems in our equipment supply and production activities and we believe important steps can be taken in emission management using energy from sources that are self-sufficient and with low emission intensity, where possible. While increasing energy efficiency, we continue our activities with the awareness that efforts to reduce energy losses provide great gains in energy savings.

To this end, CFT groups were established in the 2020 reporting year to work on increasing the efficiency of devices at high temperatures and with long operating periods. Following these efforts, the efficiency of the examined devices increased, while loss in quality decreased. With the decrease in the number of poor-quality products, the working periods of devices have been reduced, and the amount of energy consumed per week has decreased.

NuroL Teknoloji monitors electricity, natural gas, and water consumption on a daily basis, conducts improvement works to balance all consumption with the Energy Management Team established in 2021, and periodically shares consumption data with the Provincial Directorate of Environment. In order to control the emissions related to energy consumption, flue gas emission measurements are made at certain periods. At NuroL Teknoloji, energy unit cost/consumption is calculated for each of the products produced, and detailed plans are prepared to reduce energy consumption and unit costs. Thus, research for the transition to a low-carbon economy on a product basis is continuing. In order to reduce energy consumption, economic and technological equipment with high energy efficiency is preferred. Internal trainings have also been held to inform on the reduction of energy consumption. While the weight we place on renewable energy sources in our consumption is increasing day by day, we continue to use natural gas, which is defined as the "transition process" fuel, for the transition to advanced technologies on a global scale. The necessary filters and furnace burner systems are used for emission control.

NUROL TEKNOLOJİ	2019	2020	2021
<b>In-house Energy Consumption (GJ)</b>			
<b>Fuel</b>			
Natural Gas	-	14.803,95	13.630
Diesel	-	2.114,30	-
<b>Electricity</b>			
Electricity from the Grid	-	27.728,32	25.416
<b>Total Energy Consumption</b>	<b>42.747,65</b>	<b>44.646,6</b>	<b>39.046</b>

## WATER MANAGEMENT

The water resources of our country, like those of every other country in the globe, are negatively impacted by anomalies in air temperature and irregular rainfall caused by global warming. We strive to implement sustainable water use methods to protect our water resources. One of our most important goals is to reduce our water footprint through continuous improvement efforts in work areas where water is used. In order to reduce our water consumption, we strive to use the least amount of water possible in our processes that use water and to reduce the environmental impact of our processes that generate wastewater. For this purpose, we attach importance to implementing the latest water utilization practices and the latest technologies in our facilities through continuous improvement efforts. We regularly monitor our impacts by conducting environmental risk analyses to prevent negative impacts on the environment and ecosystems nearby where our campuses are located.

NUROL TEKNOLOJİ	2019	2020	2021
<b>Amount of Water Used</b>			
Well Water (m <sup>3</sup> )	-	19.547	23.336
Municipal Water (m <sup>3</sup> )	-	12.000	16.500
Total Amount of Water Used (m <sup>3</sup> )	-	31.547	39.836
<b>Amount of Wastewater Discharged Annually</b>			
Recipient Environment (m <sup>3</sup> )	-	0	0
Wastewater Channel (m <sup>3</sup> )	-	25.376	31.470
Recovered Water (m <sup>3</sup> )	-	0	0
<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	-	25.376	31.470



## WASTE MANAGEMENT

Throughout our production process, we systematically manage our waste from raw materials to the final product with a waste management policy. We view the adoption of circular economy principles as a chance to lessen waste while advancing many other activities both inside and across businesses. In this context, we adopt a reduce, reuse, recycle approach for the proper use of resources. In our product diversification and development stages, we conduct environmental impact assessment analysis with the sensitivity that our priority is recyclable materials. With this study aimed at reducing the use of natural resources and utilizing waste as raw material in the future, we aim to ensure that a product returned into the economy remains in the cycle more than once.

We temporarily store all our hazardous and non-hazardous wastes in accordance with Waste Management regulations, and record waste utilization/disposal processes with the industrial waste management plan prepared in accordance with legal regulations. We inform our personnel on our proper waste segregation methods via toolbox talks in the production area. We provide regular training and prepare instructions to raise environmental and zero-waste awareness. We develop intervention methods against spills, leaks, and environmental incidents that may occur in the facility and we always fulfil our responsibility by training our personnel on the subject.

NUROL TEKNOLOJİ	2021
<b>Hazardous Waste (kg)</b>	
Hazardous Waste	19.589
Medical Waste	3
Herbal Waste	-
Amount of Contaminated Packaging	1.426
Protective Clothing	-
Oil Filters	-
Hazardous Parts and Process Waste	-
Potentially Infectious Waste	-
Liquid and Solid Fats/Oils	-
Total Quantity of Hazardous Waste	21.018
<b>Non-Hazardous Waste (kg)</b>	
Scrap Waste	-
Home Waste	207.870
Plastic Waste	6.180
Iron and Steel	-
Mixed Metals	3.698
Packaging Waste (Paper - Cardboard)	55.390
Cables	-
Composite Packaging	104.904
Total Quantity of Non-hazardous Waste	266.958

## OCCUPATIONAL HEALTH AND SAFETY PRINCIPLES

Nurol Teknoloji, a company with a long history in the defense industry, protects military and security personnel with structural, personnel, and vehicle ballistic protection armor systems produced from advanced ceramic and composite materials. Nurol Teknoloji offers a healthy and safe working environment to all its employees and stakeholders with the same dedication and the understanding of HUMAN FIRST in its production activities. Since its founding, it has carried out all occupational health and safety actions with the same attention in collaboration with its personnel at all levels. Our goals in relation to our occupational health and safety activities are valid for all our stakeholders as well as our operating region. We conduct risk analysis studies on all our company's machinery and equipment by assessing the frequency of uses, users, and potential impacts on the environment. In addition to the legally required occupational health and safety training, basic training and toolbox talks are diligently carried out to foster an OHS culture among our staff.

Occupational health and safety activities are regularly monitored by the senior management, legal requirements are fulfilled through monthly meetings of the occupational

safety committee, and we receive the opinions of all our employees ensuring the involvement of our employee representatives. For this reason, we believe that occupational health and safety is a teamwork, and we place a high value on employee engagement. As part of occupational health and safety legal regulations and the requirements of the ISO 45001:2018 standard, we carry out our work for the safety of our employees systematically with the documentation infrastructure.

In line with the goal of providing a healthy and safe working environment, our employees at Nurol Teknoloji regularly undergo periodic health checks to prevent occupational diseases. With the near-miss system, which we follow digitally with the participation of our employees, we lower our occupational accident severity rates by immediately intervening in the causes of near-miss incidents.

Our most important mission is to create a sustainable occupational health and safety environment with continuous improvement efforts in all our fields of activity to raise awareness of how our employees should respond in the face of hazards and risks and to strengthen awareness of occupational safety rules.

OHS Training Courses	Total Training (man hours)			Employee Training (man hours)		
	2019	2020	2021	2019	2021	2021
Nurol Teknoloji	2.210	5.180	5.688	17	20	18

Toplam Kaza Sayı, Frekans ve Ağırlık Oranı	Number of accidents			Total Frequency of Accidents			Weighted Ratio of Accidents			Total Working Hours		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
Nurol Teknoloji	-	13	24	-	5,77	9,87	-	45,67	68,61	-	621.600	743.360

## NUROL TEKNOLOJİ VALUE CHAIN MANAGEMENT

Nurol Teknoloji contributes socially to the entire value chain with the products it develops and the added value it creates, as well as the jobs it creates. The protection systems and other defense technologies we have developed help our users to survive and to return home to their families safely. Thus, it creates a sense of trust and social security for our sponsors and stakeholders who invest large amounts in society.

With the technologies we have developed and the products we own, we increase both deterrent power and defense capabilities, while contributing to making the world in which we live a more peaceful place. Our employees continue to work with maximum motivation with the pride of being a part of performing such a valuable mission. As a result of our quality-oriented management approach, we have to date never heard any grievances

or complaints from the stakeholders in our value chain. Any recommendations related to product development are evaluated by the relevant units, and those deemed appropriate are implemented as improvements.

Our suppliers, with whom we have been producing solutions/making purchases for a long time, are among the stakeholder groups with whom we interact most intensely. We also want our suppliers, with whom we have ongoing business relationships, to adapt to the reality that social and environmental issues have taken the place of economic ones and to plan their operations in a sustainable manner. Sustainability in the supply chain is one of the main goals as a result of this new reality. We strive to make our suppliers aware of the importance of social, economic, and environmental concerns.

We act according to the principles of accountability and social responsibility in all our relations with our customers and society, in our products we develop and operations

we conduct. We expect our suppliers to show the same transparency and responsibility in the supply of materials and services to us. These principles are:

- To comply with all legislation, laws, and rules
- To provide employees with a safe and healthy work environment
- To be respectful and sensitive to the environment
- To behave ethically and honestly
- To have a sustainable supply chain
- To provide quality goods and services
- To ensure on-time and complete delivery
- To comply with the current legislation and standards
- To strive for continuous improvement

Our company evaluates the suppliers at the end of each year and turns suppliers that fall below the required performance into passive mode on the list of approved suppliers. In addition to the already established performance evaluation criteria, we plan to carry out more comprehensive supplier evaluations based on the criteria such as human rights, labor, the environment, and anti-corruption.

We act with the awareness that adhering to the corporate culture and ethical values in our work will contribute to the corporate identity of our company, especially among our employees, and will define our relations with all our stakeholders in the value chain. To support this awareness, we direct our activities based on the Circulars and Regulations of Nurol Holding.

Among our values are integrity, respect, employee rights, occupational health and safety, customer satisfaction, environmental consciousness, high quality products, training, fight against corruption, national capabilities, and domestic production. As Nurol Teknoloji, we take great care to maintain these values that have been presented to us by our Holding and the Chairman of the Board of Directors, and with the contributions of our directors and managers.



## NUROL TEKNOLOJİ RISK MANAGEMENT

Nurol Teknoloji attaches importance to high quality product development, customer satisfaction and employee production in good working conditions. This makes effective risk management indispensable for us. For these reasons, and to minimize damage to the environment, we prepare annual risk assessment reports after carrying out risk management studies. All our projects and business processes are carefully planned out and executed.

High-, medium-, and low-risk groups were identified, along with senior management involvement in the creation of risk assessment reports and risk management studies. Once this distinction has been made, it is aimed to eliminate the risk to people and the environment, or to reduce the risk level through risk management efforts.

The lumen values of the factory lighting were measured, and additional lighting was installed in accordance with OHS rules to ensure that employees work in a safer environment.

In addition, the risk management efforts we carry out as part of our projects allow us to minimize risks through the timely implementation of preventive plans, while at the same time doing our best to ensure our project delivery times and product quality are not affected.

In 2018, this risk management approach was taken as a basis for our Gölbaşı factory, which was opened in 2018, and risk assessment reports were prepared by prioritizing the satisfaction of our stakeholders, especially the environment where the factory was established. In 2021, safer working conditions were created compared to other years, more systematically managed projects were commissioned and successfully delivered to their final customers. One of our top priorities is to make these principles a part of our company culture in the upcoming years.

# #1 GOOD PRACTICES

With the Lapseki Gold and Silver Mine Project, TÜMAD became the first Turkish mining company to be certified by the United Nations Environment Commission International Cyanide Institute for the safe and environmentally sensitive use of cyanide, by fulfilling the requirements of the Cyanide Code (ICMC), consisting of 9 policies, 29 procedures, and nearly 200 clauses, with "zero error."

The International Cyanide Code, developed by a multi-stakeholder steering committee, is one of the most well-known certification programs in the mining industry, covering the entire process from the supply, transport, storage, use of cyanide in the facility to the related communication with stakeholders of gold- and silver-producing companies.

The fact that TÜMAD has received this certification is a great benefit for our country, and TÜMAD continues its operations in accordance with sustainable mining standards while respecting nature, people, and the environment and using the best technologies currently available without sacrificing quality with all its employees.

### Shareholding Structure

Institution / Person	Capital Ratio (%)
Nurol Holding A.Ş.	100

### Key Indicators

	2019	2020	2021
Average Number of Employees	798	894	914
Total Assets (Thousand TRY)	1.808.438	3.753.995	7.665.285
Sales Revenues (Thousand TRY)	697.096	2.411.703	3.605.263
EBITDA (Thousand TRY)	443.288	1.524.084	2.342.321

In line with the requirements of the European Bank for Reconstruction and Development and sustainable mining, TÜMAD Mining, which processes the underground riches of our country and brings them to the national economy, plays an important role in reducing foreign dependency and closing the current account deficit by creating added value and employment with its activities carried out in İvrindi and Lapseki Gold and Silver Mines, which are among the best examples in the world in terms of design parameters, monitoring methods, pollution prevention and control, and resource efficiency. Approximately 540 thousand ounces of gold and 1 million ounces of silver were produced and brought to the national economy since the commissioning of both operations until the end of 2021.

With the exploration and reserves expansion activities carried out, the existing reserve for the İvrindi Mine expanded from 45 million tons to 90 million tons and the mine's life was extended until 2041. For the Lapseki Mine, the nearby Şahinli field was acquired. With additional exploration, the existing reserve of 7 million tons will expand to 16 million tons, extending the mine's life until 2037. In addition, efforts are underway to realize large-scale mining projects with exploration activities in other fields in Türkiye and overseas.

TÜMAD, which adopts sustainable mining criteria as a principle in all processes from exploration to rehabilitation, performs activities for continuous improvement by fully satisfying the highest Environmental, Occupational Health and Safety and Social Relations components available worldwide, as well as the sustainability principles determined by the European Bank for Reconstruction and Development, especially the United Nations Equator Principles.

The cyanide code is followed in all activities at the İvrindi and Lapseki mines, whose feasibility studies were made in compliance with Canadian standards NI-43-101. TÜMAD, with its Lapseki Gold and Silver Mines, is the first Turkish Mining Company to be certified by the International



Cyanide Institute of the United Nations Environment Commission with "zero error" by fulfilling the requirements of the International Cyanide Code (ICMC), which is one of the most established certification programs in the mining sector and oversees the safe and environmentally friendly use of cyanide. International Cyanide Code certification efforts for İvrindi Mine are also in progress.

Both mining businesses have the best applicable technologies as they include all components of Integrated Management systems and national and international standards. The businesses also hold ISO 9001:2015 Quality Management System, ISO 14001:2015 Environmental Management System, ISO 45001:2018 Occupational Health and Safety Management System, and ISO 27001:2013 Information Security Management System Certifications. In our activities, we ensure economic and social growth by protecting the environment, with open and transparent communication that respects values, social approval, complaints and feedback, stakeholder participation, local procurement-local employment approach to ensure the support of the people of the region for the activities. TÜMAD serves the economic growth of the region and the country with more than 2,000 employees, 70% of whom are from the region, together with subcontractors in both businesses, while contributing significantly to social development through investments in education, health, and infrastructure.

### TÜMAD and INTEGRATED MANAGEMENT SYSTEM

The ability of all our departments to carry out their activities in harmony and to develop a common understanding is only possible with the full implementation of the standard sets that best suit the organization.

Acting with the belief that a sustainable development can only be achieved by carrying out activities in all areas with the same understanding, we create a business environment that will enable all our units to work in coordination. This understanding serves as the basis of our integrated management system, which enables our employees, who take part in our value chain and contribute at all levels, to carry out their activities in a healthy and sustainable manner.

While process-based risk management activities are carried out through processes, risks and opportunities in each process are handled using Risk Assessment Forms created by the related employees and approved by the General Manager.

In target-based risk management, the risks for the realization of the targets are determined in the activities carried out on the targets of our businesses for the relevant year.

### TÜMAD and HUMAN RESOURCES MANAGEMENT

With the knowledge that TÜMAD's biggest asset is its people, we make it a priority to raise skilled personnel for our industry and to invest in our human resources, so

they continue to grow and reach their full potential.

We conduct all our activities as per the following principles in an effort to provide equal opportunities for all our employees.

- To hire individuals that are creative, self-aware, open to growth, and fit for leading TÜMAD into the future, allowing the business to carry out its operations successfully and efficiently
- To prepare and implement training and development programs to contribute to the development of our employees
- To create a continuously learning organizational structure
- To implement a fair and equal human resources management system that will increase the loyalty of our employees
- To support the social and cultural development of our employees
- To promote the sustainability of corporate culture and awareness
- To provide a safe working environment for all our employees in accordance with the principles of Occupational Health and Safety
- To create a work environment that promotes reliability, trust, and ethical values
- To continuously increase the satisfaction of our employees
- To prohibit discrimination against race, religion, language, and gender among our employees, and to take measures to protect against physical, mental, and emotional abuse





**İVRİNDİ PROJECT**

In 2021, 113,103 ounces of gold and 262,150 ounces of silver were produced at the İvrindi Project, where production activities started in the third quarter of 2019. A total of 240,942 ounces of gold and 731,347 ounces of silver have been produced and added to the national economy since the project's start.



**LAPSEKİ PROJECT**

At the Lapseki Gold and Silver Mine, which is the world's best example in the industry in terms of design parameters, monitoring methods, pollution prevention and control, and resource efficiency, the open pit operations are carried out in the Kestanelik, Karakovan, S, and SBX pits in five main processes: drilling, blasting, ore loading, transportation, and ore unloading.

Underground ore mining started in the 2019 Q4. By the end of 2021, 191,111 tons of high-grade gold and silver ore were produced from seven active drifts and the length of drifts reached 8,386 meters. Approximately 3,800,000 tons of high-grade ore produced from the open pit and underground was processed with 96% efficiency in the beneficiation plant where the tank leaching method was applied to obtain gold and silver.

At the facility, which has the best available applicable environmental technology with chemical treatment, dewatering, and solid waste storage area, 107,274 ounces of gold and 54,055 ounces of silver were produced in 2021, and a total of 295,229 ounces of gold and 165,962 ounces of silver were produced throughout the project.

With all these initiatives, TÜMAD has established itself as one of the significant gold producers in the country by implementing plans for the local population's economic growth as well as for the advancement of infrastructure, employment, education, and health while respecting nature, the environment, and the people.



## TÜMAD and SUSTAINABILITY

While carrying out its activities, TÜMAD pays attention to the use of technologies that minimize the footprint of its projects and that allow full compliance with national and international standards.

In accordance with our understanding of sustainability, we apply a business model in which our employees are provided with a working environment that is subject to continuous improvement, the expectations of our external stakeholders are met.

In a world where the environment is contaminated and nature is destroyed, social and economic growth cannot be sustained. We thus take measures to monitor and reduce the environmental impact of our activities. We regularly collect samples from our mining sites to test the quality of the water, soil, and air, and we put mitigation measures in place at every level.

With the belief that mining production and the environment shouldn't be contradictory to each other and that an equitable balance should be maintained, we conduct our activities using exemplary practices demonstrating that mining can be done in an environmentally responsible manner.

We realized that the biggest gap in the mining industry, which has the potential to be a driving force in the development of our country, is the lack of trained, qualified intermediate staff. As a result, we signed a Vocational Education Cooperation Protocol with the Ministries of Energy and Natural Resources, National Education, and Nurol Holding. We completed the construction of Nurettin Çarmıklı Mining Vocational and Technical Anatolian High School, the foundations of which were laid in 2018, within 8 months, and proudly delivered it to the Ministry of National Education in 2019.

Students are taught how to prevent and protect themselves from the dangers they may encounter in mines using simulation and VR technologies at our school, which has seen significant success in a short time, has been designated as the 51st R&D center of our country, and is the first project sponsored in the field of mining in Europe. We believe that our school, which has been selected as a European Union school and will admit students from abroad, will contribute greatly to the establishment of a mining culture based on scientific data in Türkiye.

We will also complete the Erol Çarmıklı Anatolian High School currently under construction in Lapseki, Çanakkale, and hand it over to the Ministry of National Education for the 2022-2023 academic year.

Additionally, we established a fully equipped mining laboratory in a Vocational High School in Lapseki, similar to the one in İvrindi Mining High School, and made it available to our students.

We completed the construction of the Seyit Onbaşı Science and Technology Center in Havran, Balıkesir, in 2021, and it was made available to youngsters who were interested in science and technology.

We aimed to create social added value by focusing our social development efforts on women and young people, providing opportunities for vocational training, and creating appropriate employment opportunities. Additionally, the SA8000 certification process is planned to be completed in 2022 Q3, making us the first mining company in Turkey to be SA8000 certified. This standard governs socially acceptable and transparent practices like equal employment opportunities, fair treatment policies, and other minimum standards for work and social life balance.

By conducting our relations with our suppliers that provide goods and services within our value chain in line with creditor requirements and adopting procurement policies that prioritize our local stakeholders, we see that we exceed the targets set in our activities.

We regularly conduct planned and unplanned audits for our operations through local authorities, independent accredited organizations, and third-party independent auditors at monthly, quarterly, and semi-annual intervals in accordance with the principle of transparency and accountability, which is one of our sustainability criteria.

By preserving the environmental characteristics of our activity locations in the best way possible, TÜMAD's core stance on the environment is to minimize the use of natural resources and the project footprint. In this regard, it is ensured that waste generation is reduced in terms of pollution prevention and control, and resource efficiency, waste is segregated at its source and recycled, and similarly, the water footprint is minimized in facilities operating with zero discharge principle.

In the locations where our activities have been finished, we carry out afforestation and rehabilitation efforts in keeping with the natural ecosystem. Additionally, we use the water seeding technique in our rehabilitation efforts to prevent erosion and dust formation on open areas.

## DIALOG WITH OUR STAKEHOLDERS

TÜMAD assures economic and social development by protecting the environment with the understanding of social approval, complaints and feedback, stakeholder participation, local purchasing-local employment to ensure the support of the local population for its activities. Taking the employment of local people and local procurement into account while continuing its activities, TÜMAD has achieved the targeted local procurement figures while having a local employment rate of over 70% in both mines.

Communication with stakeholders is a necessity for TÜMAD to manage its priority issues. In this regard, a "Stakeholder Engagement Plan" has been prepared and is reviewed at least once a year. The purpose of this activity is to assess whether TÜMAD is able to satisfy the requirements of local communities and other relevant stakeholders, to determine whether any changes or updates are required for management, and to assess changes in project design or requirements, if any.

We present below our dialog platforms with our stakeholders, our dialog frequency and the important topics covered in our dialogues:

We meet the needs and expectations of our stakeholders through booklets, brochures, films, press conferences, scientific reports and focus group meetings, community monitoring and consultation meetings, regular stakeholder visits, OHS Board Meetings, Representative Meetings, and mine tours, as well as bulletin boards where monitoring and measurement results are announced. The informational materials used cover our operations' best practicable technologies, requirements for compliance with international cyanide code, policies, management plans and international certifications, as well as community health and safety issues such as chemical and traffic management, noise, dust, and cumulative impacts.

Target Group	Participation Means/Method	Timing/frequency during commissioning and operation
Local Community	Information brochures (policies and strategies), Public Meetings, Media news, Community monitoring committee meetings	When deemed necessary and upon request
Local Community	Complaint registration, Interviews, Suggestion boxes, e-mails and telephone, Public Meetings, Grievance mechanism, Community monitoring committee meetings	Monthly
Communities & local government agencies and relevant authorities and NGOs	Workshops, Public meetings, meetings with NGOs, Posters, Media Community Monitoring Committee	Daily, Weekly, Monthly, When necessary
Communities & NGOs, Local Government Agencies and relevant authorities (especially emergency services department managers, police, fire, health and gendarmerie)	Workshops, Exercises, Meetings with the public and local institutions, Posters	Joint emergency drills - quarterly
Non-governmental organizations (NGOs)	Focus group meetings with relevant groups and NGOs, Sponsorships, Workshops, Research Monthly public meetings, Meetings with non-governmental organizations, Regular environmental health progress reports through the website, Posters, Media, Sectoral fairs, conferences, Goldminers' Association activities	Regular meetings every 6 months, when needed/requested, within social activities
Local and national government agencies and relevant authorities	Meetings with government agencies	At least every 6 months, as needed
Emergency services, police, fire brigade, healthcare providers and gendarmerie	Meetings with government institutions and non-governmental organizations, Posters, Public meetings	Every 3 months, as needed
Industrial Organizations and Goldminers' Association	Technological information, Air quality compliance certificate	Annually
Unions	Monitoring meetings	Every 6 months
Media	Press conferences, Press releases, Media monitoring	When necessary
TÜMAD employees	Bulletin, Face-to-face interviews, OHS committee trainings Company social events for employees, Employee Complaint Mechanism	Monthly, In the event of Complaints, When Necessary
TÜMAD subcontractor employees	Newsletter, Face to face interviews, OHS committee, Worker audits	Monthly, as needed



**OUR PRIORITIES**

At TUMAD, sustainability also refers to long-term, responsible actions that provide added value to external stakeholders and employees. For this reason, our material issues matrix was created by analyzing our important issues obtained through our Stakeholder Engagement Methods and our sustainability strategy was determined based on this matrix. As a result, we examined the key concerns we learned about through our stakeholder engagement methods to create our material issues matrix, and we built our sustainability plan on that matrix. Our priority issues are: Environmental and Social Impact Assessment, Social Approval Mechanism, Fair Treatment, Community Development, Governance Principles (Anti-Corruption), Minimizing Foreign Dependency in Gold Production, Compliance with International Standards, Risk Management, Water Management, Waste Management, Biodiversity, Combating Climate Change, Local Procurement, Local Employment, Supplier Management, Stakeholder and Complaint Management, Identification and Utilization of Best Available Technologies, Brand Equity, Gender Equality, Employee Engagement and Satisfaction, Promoting Corporate Culture, Corporate Social Responsibility, Livelihood Improvement, and Efficient Use of Resources.



TUMAD, as a responsible member of society, places equal importance on being properly understood in the social environment in which it operates, working in harmony with the current environmental and social conditions, respecting local values and different cultures, and ultimately working within the framework of "social approval" as part of "Environmental and Social Impact," which is one of its top priorities.

Social impact assessments have been carried out in both ongoing projects. These focused on discovering the needs of local communities, evaluating opinions and feedback from local people and other stakeholders around the mine, and identifying support mechanisms. Another advantage of social impact assessments is that they provide guidance to improve and shape stakeholder engagement and community relations. This creates an ideal working environment for employees, and a preferred company and site. Local employment is one of the main benefits provided by the Company to local communities affected by the mineral exploration and operational activities. It is of great importance to ensure the local employment principles are well defined in order to maximize local employment opportunities in our project regions, and to ensure that job opportunities are distributed among all affected settlements in a way that settlements within the framework of the circle theorems are prioritized, and the process is carried out in a transparent manner.

In TUMAD, which has adopted the principle of local procurement, requirements such as the use of goods and services, equipment rental, use of transportation services, transportation services for the mining workforce, purchasing food or catering services, etc. are supplied through the existing TUMAD Local Procurement Management Plan.



**TUMAD AND OUR ENVIRONMENTAL AWARENESS**

As TUMAD, we carry out our activities with our scientific-based business approach and the know-how to ensure the requirements in the entire value chain are met throughout the production of ore. At TUMAD, environmental issues are monitored by a team of approximately 40 people operating under the Environment and Sustainability Department in accordance with the Environmental Management certification.

Our fundamental approach to the environment is to protect the environmental characteristics of our sites in the best way possible while minimizing the negative environmental impact of our operations. Accordingly, data on air, water, soil quality, plant-animal species, cultural and social assets are collected before starting operations at our mining sites. The data we obtain are taken into account in all stages of exploration, investment, construction, production, closure and rehabilitation, and mitigation actions are planned and implemented within the framework of the environmental and social management system.

In all our projects, all national legislation, and requirements, including those of the relevant ministries, especially the Ministry of Environment and Urbanization, as well as creditor obligations, are complied with. In this direction, we carry out our activities in full compliance with the limit values defined by national and international standards, and the practices and limits stated in the best applicable standards in processes related to greenhouse gas and dust emissions, water management, soil protection, biodiversity, and noise and vibration management.

The Environment and Sustainability Department of TUMAD, which has improvement targets as well as full compliance, monitors the measurements and analyses of the following parameters periodically. In order to systematically monitor all our environmental and social compliance practices, the following management plans are implemented through our "Environmental and Social Management System."

- Environmental and Social Management System Plan
- Air Quality Management Plan
- Framework Biodiversity Action Plan
- Community Health, Safety, and Security Management Plan
- Community Development Plan
- Cultural Heritage Management Plan
- Sub-Contractor Management Plan
- Cyanide Management Plan
- Emergency Management Plan
- Explosives and Hazardous Materials Management Plan
- HR Training Plan
- Workforce Management Plan
- Conceptual Mine Closure Plan
- Noise and Vibration Management Plan

- Conceptual Mine Closure Plan
- Spill Cleanup Plan
- Stakeholder Engagement Plan
- Local Procurement Management Plan
- Traffic Management Plan
- Health and Safety Management Plan
- Waste Management Plan

We convey the outcomes of our environmental management practices to our suppliers and subcontractors, who are our significant stakeholders, since TUMAD is aware that effective environmental management is only possible with the involvement of the whole value chain. Our employees are regularly trained to improve our environmental awareness and performance, reduce our use of resources such as energy, water, and air, and regarding water and soil monitoring activities, hazardous substance and chemical management, integrated waste management, and reduction of waste generation.

In 2021, in addition to internal environmental awareness training programs, environmental awareness training was initiated for students in neighboring village schools. Both visual and practical environmental awareness training was provided in schools in compliance with the pandemic rules.

Monitored Parameter	Monitoring Frequency
Blasting, noise and vibration	Instant
HCN gas	Daily
H2S gas	Daily
SOx, NOx	Every 6 months
Groundwater quality measurement	Monthly
Surface water quality and flow measurement, operating flow monitoring stations	Instant
Meteorological data	Instant
Water level measurements from observation wells	Weekly
Particulate dust (PM10) measurement	Hourly, Monthly
Settled dust measurement	Monthly
PM10, PM2.5, heavy metal analyses	Every 6 Months
Water and wastewater samples	Daily, weekly, monthly
Solid waste landfill drainage water physical parameters and metal analyses	Daily

Training Courses on the Environment	2019 (person)	2020 (person)	2021 (person)
İvrindi Gold Mine	1459	1.257	501
Lapseki Gold Mine	753	544	651

## ENERGY AND EMISSIONS MANAGEMENT

Within the scope of our efforts to combat climate change, our energy consumption and emissions arising from our mining activities are monitored constantly. It is our aim to make use only of efficient systems in energy management, as well as best applicable technologies, to reduce the direct and indirect effects of greenhouse gas emissions in line with the climate changes risk assessment, and at the end of each year, continuous improvement is observed by following the targets set for the next year.

Emission controls at our facilities are measured and evaluated instantaneously by measurement stations that measure emissions 24/7, 365 days a year. In addition, our Environment and Sustainability Departments carry out emissions measurement of mining areas and their surroundings monthly, working with accredited laboratories, and control the results.

In the event of unexpected measurement values, immediate actions are taken to address the relevant emissions parameter. In areas where the surface cover has been removed as a result of mining and infrastructure activities, the surface cover is restored through hydroseeding. Thus, soil erosion and dust spread due to meteorological conditions are reduced, and visual improvements are made. In vegetable soil storage areas, the surface of the vegetable soil storage area is covered using a wet and dry seeding method. In this way, the soil is protected from deterioration in fertility, and erosion and dust are also prevented.

Environmentally friendly, organic-based dust suppression methods are used to combat dust on the stabilized roads in the field.

In open-pit production, the blasting is carried out using millisecond delay capsules, thus reducing the effects of air shock, noise, and vibration. In order to reduce dust emissions, the buildings in which crushing and screening activities are carried out, and the conveyor belts used to convey materials are closed to the atmosphere. In the areas in which crushing and screening operations are carried out, dust collection systems have been established. The dust captured by the dust collection systems is returned to the facility. In open pits, on the other hand, dust formation is minimized by wetting areas that are to be blasted.

One of the most important parameters we follow in our efforts to reduce our consumption of natural resources and our environmental impact on the environment is our energy resources and energy consumption data. Making use of this data, we develop processes with high energy efficiency in our facilities, making use of the latest and best technologies, while minimizing energy losses.

Although TÜMAD has a small carbon footprint, this is mostly due to the electrical energy utilized in the facility's crushing and screening activities. Some of the energy consumed in the facility is supplied from the Göksu Hydroelectric Power Plant, which has the Renewable Energy Resource Guarantee System Certificate, to reach the desired carbon emissions value, and this data is used in Scope 2 calculations.

TÜMAD / İVRİNDİ	2019*	2020	2021
<b>GHG Emissions</b>			
Scope 1	29.800,32	52.022,85	49.267,3004
Scope 2	2.303,65	7.842,16	6.234,53
<b>Total Emission</b>	<b>32.103,97</b>	<b>59.865,01</b>	<b>55.501,8304</b>

\*Year 2019 data for İvrindi Facility covers July-December 2019 since it started operations in July.

TÜMAD / LAPSEKİ	2019	2020	2021
<b>GHG Emissions</b>			
Scope 1	14.898,00	14.425,26	14.238,86
Scope 2	6.522,00	5.239,90	9.934,06
<b>Total Emission</b>	<b>21.420,00</b>	<b>19.665,16</b>	<b>24.172,93</b>



TÜMAD / İVRİNDİ	2019	2020	2021
<b>In-house Energy Consumption (GJ)</b>			
<b>Fuel</b>			
Diesel	330.253,25	597.177,81	714.422
<b>Electricity</b>			
Electricity from the Grid	48.224,00	291.361,57	274.773,17
<b>Total Energy Consumption</b>	<b>378.477,25</b>	<b>888.539,38</b>	<b>989.195,17</b>

TÜMAD / LAPSEKİ	2019	2020	2021
<b>In-house Energy Consumption (GJ)</b>			
<b>Fuel</b>			
LNG	783.415,17	1.308.557,79	1.441.683 sm <sup>3</sup>
Diesel		160.462,25	115.623
<b>Electricity</b>			
Electricity from the Grid	126.716,72	146.570,58	153.395,52
<b>Total Energy Consumption</b>	<b>910.131,89</b>	<b>1.615.590,62</b>	<b>322.706,52</b>

## WATER MANAGEMENT

Water, one of our most important resources, is affected by changes in temperature and rainfall pattern, and has been strongly affected by climate change in recent years. For this reason, we pay attention to our efforts to keep water basins clean and to carry out recycling where possible.

We define the water used in our production as blue water, green water, and gray water and perform the water footprint calculation of our activities.

To this end, while operating according to a “zero discharge” principle in our enterprises using the most up-to-date applications and the latest technologies, 80 percent of water is recovered, and raw water consumption is minimized. To protect water resources, Flow Observation Stations have been established on the Madra and Sıpacı Streams in the vicinity of the İvrindi Plant and on Kovanlık Stream close to the Lapseki Plant for the monitoring of quantity and quality, and instant data monitoring is carried out regularly.

A total of 12 observation wells and 8 surface water sources in the İvrindi Plant and 17 observation wells and 3 surface water sources in the Lapseki Plant are monitored every month in terms of physical parameters, and quarterly biological and chemical parameters. Following the innovations made and realized related to water management in 2021, the water released from the filter press, KAD sub-drainage, underground galleries, and waste at the Lapseki Plant is being reconditioned in the settling basin and reused in the facility, at the mine site, and for road irrigation and dust prevention.

In addition, as defined in the Community Development Plan, awareness for sustainable water is raised by organizing training programs on qualified agricultural water management in the surrounding settlements engaged in agriculture and livestock.

In 2021, water balance activities were initiated in the facilities, water cycle designs were made in all processes, water surplus and deficit were identified, and related improvement efforts as well as sustainable water management implementation activities were started.

TÜMAD / İVRİNDİ	2019	2020	2021
<b>Amount of Water Used</b>			
Well Water (m <sup>3</sup> )	286.644	477.580	509.606
<b>Total Amount of Water Used (m<sup>3</sup>)</b>	<b>286.644</b>	<b>477.580</b>	<b>509.606</b>
<b>Amount of Wastewater Discharged Annually</b>			
Recipient Environment (m)	29.200	29.200	36.500
Wastewater Channel (mP)			
Recovered Water (mP)			
<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	<b>29.200</b>	<b>29.200</b>	<b>36.500</b>

TÜMAD / LAPSEKİ	2019	2020	2021
<b>Amount of Water Used</b>			
Well Water (m <sup>3</sup> )	117.432	185.140	166.169
<b>Total Amount of Water Used (m<sup>3</sup>)</b>	<b>117.432</b>	<b>185.140</b>	<b>166.169</b>
<b>Amount of Wastewater Discharged Annually</b>			
Recipient Environment (m <sup>3</sup> )	14.600	14.600	21.900
<b>Total Amount of Discharged Water (m<sup>3</sup>)</b>	<b>14.600</b>	<b>14.600</b>	<b>21.900</b>



## WASTE MANAGEMENT

We aim to reduce waste and reuse our waste to the benefit of the economy through circular economy practices. In this context, in accordance with our Waste Management Plan, we accurately evaluate and document the quantities, the physical and chemical properties, and the associated hazards of the waste produced during our mining activities, by defining them down to the lowest possible breakdown.

This approach incorporates an up-to-date conceptual model that demonstrates the management of the TÜMAD waste inventory and the long-term physical and chemical effects of the inventory on the environment. This model is validated based on the results of testing and monitoring activities. Waste Management Plans are implemented for the assessment of the quality of the Waste material that will be produced, based on algorithms established following rust characterization tests carried out by the leading universities in the country, prior to its removal from the site for sorting, transport, storage, and management.

**In 2021, a total of 282,640 kg of waste contaminated with hazardous substances, 1,277,610 kg of non-hazardous waste, and 273,500 kg of plastic waste were generated at our İvrindi and Lapseki facilities. These materials were duly transported and disposed of or recycled through authorized agencies.**

TÜMAD	2020	2021
<b>Hazardous Waste (kg)</b>		
Medical Waste	253.450	110
Herbal Waste	220	400
Amount of Contaminated Packaging	2.000	131.600
Protective Clothing	126.290	105.800
Oil Filters	2.200	1.000
Hazardous Parts and Process Waste	600	8.800
Liquid and Solid Fats/Oils	12.070	22.870
<b>Total Quantity of Hazardous Waste</b>	<b>407.080</b>	<b>270.580</b>
<b>Non-Hazardous Waste (kg)</b>		
Scrap Waste	82.150	68.200
Home Waste	536.030	573.660
Plastic Waste	162.250	273.500
Iron and Steel	357.090	304.900
Mixed Metals	9.110	30.500
Packaging Waste (Paper - Cardboard)	4.750	26.000
Cables	-	850
<b>Total Quantity of Non-hazardous Waste</b>	<b>1.151.380</b>	<b>1.277.610</b>

## OCCUPATIONAL HEALTH AND SAFETY PRINCIPLES

TÜMAD places a high priority on Occupational Health and Safety awareness and practices because it is aware that its employees are its most valuable resource.

All our activities are based on Occupational Health and Safety, which is also the cornerstone of our sustainability culture. Based on this approach, we carefully evaluate the opinions and recommendations of all our employees on occupational health and safety. Beyond what is required by law, we make sure that each of our employees' physical and emotional health is safeguarded.

Our Occupational Health and Safety Management Plan has been established in line with our OHS Policy, based on the detection of hazards and the assessment of risks, compliance with legal and other requirements, fulfilment of OHS objectives, compliance with procedures and instructions, training and awareness activities, communication, participation, consultation, control, and audits.

Our aim at TÜMAD is to spread OHS awareness and culture among our staff, and throughout the region.

Following are some of the initiatives we have carried out in accordance with our objectives and OHS Management Plan:

- The determination of OHS training needs on a task basis, and the timely delivery of the necessary training
- Minimizing risks to acceptable levels based on Risk Assessment activities
- Eliminating dangerous situations and activities through Work Area Inspections and controls by OHS Experts
- Receiving the opinions and recommendations of our employees, giving feedback during Weekly Representative Meetings
- Determining the root causes of accidents that have occurred during the Weekly Incident Evaluation Meetings and following up corrective actions.
- Providing 24/7 healthcare for emergencies, carrying out inspections and risk assessments as part of a preventive medicine approach
- Conducting regular trainings for the TAK (TÜMAD Search and Rescue) Team, which was established to intervene in potential emergencies and extreme circumstances and to provide external support, and conducting drills
- Preparing annual OHS initiatives and ensuring their implementation after evaluation

OHS Training Courses	Total Training (man hours)			Employee Training (man hours)		
	2019	2020	2021	2019	2020	2021
İVRİNDİ	5.143	10.376	13.627	11,42	20,39	25,42
LAPSEKİ	8.429	2.840	9.045	15,02	9,16	27,83



## OHS PERFORMANCE INDICATORS

We collect information about our status from the OHS performance indicators (Accident Frequency Rate/Accident Severity Rate), which are monitored as per our corporate objectives and through which we assess the efficacy of the corrective actions we take to prevent all types of occupational accidents and to increase work efficiency by reducing the potential loss of workforce. These indicators also guide us in planning our efforts.

Since the implementation of OHS activities, the frequency rate of recordable incidents in our operations has significantly dropped as a consequence of efficient OHS initiatives and elevated employee OHS awareness.

At the Weekly Incident Evaluation Meetings, it is ensured that the root causes of accidents are determined, and the corrective actions taken are followed up. Risk assessment reports are also updated considering the corrective actions taken to prevent similar potential accidents.

In line with the Major Accident Prevention Policy, safety reports have been prepared for both of our facilities and the validity of our efforts have been approved as fully compatible, with the audits conducted by the Ministry of Labor.

Total Number of Accidents, Frequency, and Weight Ratio	Number of accidents			Total Frequency of Accidents			Weighted Ratio of Accidents			Total Working Hours		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
<b>İVRİNDİ</b>	16	30	16	8,62	9,39	5,78	0,13	0,184	0,11	1.856.919	3.193.964	2.769.142
<b>LAPSEKİ</b>	3	6	1	2,36	3,63	0,48	0,01	0,02	0,04	1.263.625	1.651.220	2.103.150

\*Only the accidents that resulted in lost time are shared.

\*\*When calculating the Total Accident frequency, calculations were made based on 1.000.000 hours and when calculating the Total Accident Severity Rate, calculations were made over 1.000 hours.

\*\*\*No incidents involving cyanide or other chemicals have occurred in both facilities so far.

Safety reports have been prepared for both facilities in accordance with the Major Accident Prevention Policy, and the Ministry of Labor's audits have fully verified the validity of our work.

## DISASTER AND CRISIS MANAGEMENT (TÜMAD SEARCH AND RESCUE TEAM)

Practices and plans to be implemented against all extraordinary conditions and disasters such as fire, explosion, earthquake, flood, chemical releases, terrorism, and sabotage are determined in advance, and the necessary team and equipment are made available accordingly. In conformity with national and international standards, emergencies are handled with the proper equipment and personnel. Additionally, as part of disaster and crisis management, assistance is offered in case of need in areas near to our mining sites or in locations where our stakeholders reside.

Training programs are held to improve emergency and crisis management systems and to increase the competence of the personnel in charge. To minimize the risks that may arise in emergencies, to test existing emergency systems and methods, and to increase the level of awareness of our employees, drills are conducted in accordance with the scenarios prepared, and post-drill performance evaluations and corrective action plans are made accordingly. Measures taken against emergency risks are constantly reviewed.

## EMPLOYEE ENGAGEMENT AND CONSULTATION PRACTICES

TÜMAD ensures that all employees have a voice in management processes through Weekly Representative Meetings, OHS Observation Forms, Complaint and Feedback System, OHS Board Meetings, and Personal Protective Equipment Assessments, which are carried as part of "Employee Engagement and Consultation" practices in the development, planning, implementation, performance evaluation, and improvement activities of management systems.

## OHS AND RISK MANAGEMENT

TÜMAD conducts detailed risk assessment activities to protect its employees from occupational accidents and diseases. As part of Risk Management, training programs were completed to improve the skills of all employees in the OHS risk assessment team.

Within the scope of Risk Management, "Occupational Safety Analysis" is conducted for tasks without a procedure/instruction, ensuring that task-based measures are taken against potential hazards. Subcontractors' method statements and risk assessments are examined in detail. Thus, subcontractors are ensured to operate with proactive approach principles.

## CONTINUOUS IMPROVEMENT PRACTICES FOR OHS

### 12 Golden Rules

Posters on "12 Golden Rules that Save Lives" were prepared and hung in work areas to highlight the hazards and risks that employees may face during operations and to raise awareness about the precautions needed to be taken.



Road Safety

Traffic management procedures are implemented for employees driving vehicles within the facility. As part of traffic management procedures, road signs/markings, speed limit signs, honk signs, radar speed signs, etc. are implemented.

### OHS Processes in Cyanide Management /ICMC

Hazards and risks that may occur during the transportation of sodium cyanide used for gold and silver cyanidation to the facility, as well as during transportation, storage, and use within the facility have been identified. The manual defines the appropriate actions to these risks and hazards. Necessary efforts have been conducted for OHS processes in accordance with the International Cyanide Management Institute protocol.

## HEALTHY MANAGEMENT

24/7 healthcare services within the scope of preventive medicine, emergency preparedness, audits, and risk assessments are ensured.

Medical treatment, medical analysis, and medical imaging continued in the health units of our facilities. Personnel engaged in food processing were periodically subjected to tests and examinations. Microbiological and bacteriological analyses of drinking and utility water used in workplaces and food served in the cafeteria were regularly conducted, and it was determined that the report findings were within permissible limits.

### Occupational Hygiene Measurements

Considering that employees may be exposed to various hazards during work, personal exposure measurements on physical and chemical risk factors in the environment and on the person are carried out and recorded by accredited organizations. Occupational hygiene measurements and Anti-Dust Meetings are held at specified periods. By evaluating the results of ambient measurements and the meetings held, it is ensured that necessary measures are taken immediately in case of situations that are not within legal limits.

### Blood Donation

Through the collective blood donation campaign regularly held every year, 78 volunteer employees donated blood to the Turkish Red Crescent Blood Center in 2021.





**Dialogues with all our stakeholders are of the highest importance and priority to Nurol Holding and our group companies.**

## **NUROL GROUP OF COMPANIES CORPORATE MEMBERSHIPS**

BM Küresel İlkeler Sözleşmesi Katılımcısı ve imzacısı	Dünya Su Konseyi	Türk Amerikan İş Konseyi
Avrupa Uluslararası Mühendisler Birliği	Uluslararası Yol Federasyonu	Türk Sanayici ve İş İnsanları Derneği
TÜRKİYE METAL SANAYİCİLERİ SENDİKASI	Türk Mühendis ve Mimar Odaları Birliği	Türkiye Odalar ve Borsalar Birliği
GİRİŞİMCİLİK VAKFI Türkiye Girişimcilik Vakfı	TÜRKİYE İHRACATÇILAR MECLİSİ	TÜRKİYE MÜTEAHHİTLER BİRLİĞİ
YOLLAR TÜRK MİLLİ KOMİTESİ TURKISH ROAD ASSOCIATION Yollar Türk Milli Komitesi	ALTIN MADENCİLERİ DERNEĞİ Altın Madencileri Derneği (Yönetim Kurulu Başkanlığı) *	Dış Ekonomik İlişkiler Derneği *
İSTANBUL TİCARET ODASI	İMMİB İstanbul Maden ve Metaller İhracatçıları Birliği	ANKARA TİCARET ODASI
AHİD Ankara Halkla İlişkiler Derneği	Ar-Ge Merkezleri İletişim ve İşbirliği Platformu	TSSKK ODTÜ Teknokent Savunma Sanayii Kümelenmesi
İKAMİD İnsan Kaynakları Meslek Derneği	ODÜ MEZUNLARI DERNEĞİ ODÜ Mezunları Derneği	UMREK Ulusal Maden Kaynak ve Rezerv Raporlama Komisyonu
Türkiye materials marketplace	skd TÜRKİYE	

Amerikan Kalite Derneği	Türkiye'de İngiliz Ticaret Odası Derneği	Türkiye Asfalt Mühendisleri Derneği
TÜRKİYE İNŞAAT SANAYİCİLERİ İŞVEREN SENDİKASI	Türkiye Kalite Derneği	Savunma ve Havaçılık Sanayi İhracatçıları Birliği *
TTYD Türkiye Turizm Yatırımcılar Derneği	tmmob mimarlar Odası	TÜRKİYE İNSAN YÖNETİMİ DERNEĞİ Güney Marmara Şubesi
TMD Türkiye Madenciler Derneği	SaSaD Savunma Sanayi İmalatçılar Derneği (Yönetim Kurulu Üyeliği) *	OSİAD
BAE BAE Yürütme Kurulu Üyeliği *	DAİB Orta Anadolu İhracatçıları Birliği *	İNSAN KAYNAKLARI MESLEK DERNEĞİ
Ankara Sanayi Odası	ANGİAD Ankara Genç İş Adamları Derneği	OSSA OSTİM DEFENSE AND AVIATION CLUSTER
ICF International Coach Federation	SRM SOCIETY FOR HUMAN RESOURCE MANAGEMENT	TMMOB İNŞAAT MÜHENDİSLERİ ODASI
LÖSEV Lösemili Çocuklar Vakfı	İSO İstanbul Sanayi Odası	TMMOB İNŞAAT MÜHENDİSLERİ ODASI

\* Yönetimde Üyeliğimiz bulunan, kurumsal üyeliklerimizdir.



## INTEGRATED MANAGEMENT SYSTEMS





## NUROL HOLDING AND SUSTAINABILITY

Nurol Holding seeks continuous improvement for the management of environmental and social impact with its sustainability strategy across all sectors in which it operates. Our core values of "Equality, Justice, Loyalty" and "Social Benefit," which play a significant role in our corporate culture, shape our understanding of sustainability. This understanding has been an important guide for us in improving our business resilience and maintaining our economic performance efficiently even throughout the pandemic.

At Nurol, our people come first, and the health and safety of our employees are our top priority. We continuously improve our working conditions and take the necessary measures regarding occupational health and safety and implement them meticulously. With the strength we derive from our qualified workforce and our responsible production approach, we took our place among the companies that continued their growth and increased their economic performance during the pandemic. We have incorporated our sustainability culture into every aspect of our management strategy while also boosting the environmental and social effect of all our activities.

As Nurol, we are committed to protecting the environment and social fabric, whether related to our activities or not. We effectively implement our sustainability policies in all management and production processes and support preventive approaches that do not have a negative impact on the environment. We strive to promote a more effective environmental responsibility and support initiatives to this end.

## INTEGRATED MANAGEMENT SYSTEMS

We build our culture of excellence on a holistic quality approach. At Nurol Group of Companies, we aim to implement management systems such as quality management system, environmental management system, occupational health and safety management system, information security management system, greenhouse gas management system, energy management system, quality management system in defense and aerospace in accordance with international standards and to ensure that these systems are permanent, continuously improving, and sustainable.

We believe that all our employees should be involved in the process of achieving continuous improvement and sustainability in our integrated management systems. We believe that our employees can only increase the competitiveness of the institutions for which they work by making a difference in their working lives, and to this end, we organize various activities such as meetings, trainings and workshops in which improvements, developments and results in our processes, and best practices are shared and discussed. We share these activities with our internal stakeholders via the Nurol Holding "Nurol Quality Portal", and with all our stakeholders through the "World of Nurol" magazine.

Companies	Awards and Achievements
FNSS Savunma Sistemleri A.Ş.	<b>EU-OHSA Good Practice Award Turkey Representative</b> Presidency of Defense Industries (SSB) and Defense and Aerospace Industry Exporters' Association (SSI) <b>Export Awards - "The company with the highest exports in the ground vehicles category in the last 10 years"</b>
	Presidency of Defense Industries (SSB) and Defense and Aerospace Industry Exporters' Association (SSI) <b>Export Awards - "Third company with the highest exports in the defense industry"</b> Aegean Development Association - "Best Defense Industry Ground Vehicles Manufacturer" award
<b>Nurol Construction</b>	For the last seventeen years, NUROL Construction has proudly taken place in the "Top 250 Global Contractors" list published by ENR magazine.

Standards, Certificates, Documents	Nurol Construction	Nurol Makina	FNSS	Nurol Teknoloji	TÜMAD
AQAP-2110 NATO Quality Assurance Requirements for Design, Development and Production		✓	✓		
ISO 9001 Quality Management System	✓	✓	✓	✓	✓
12047 Service Qualification Certificate		✓			
EN ISO 3834-2 Welded Manufacturing Competence Certificate		✓			
ISO 14001 Environmental Management System	✓	✓	✓	✓	✓
NATO SECRET Security Document	✓	✓	✓	✓	
NATIONAL CONFIDENTIAL Facility Security Certificate	✓	✓	✓	✓	
ISO 17025 Ballistic Test Laboratory				✓	
General Requirements for Competence in TS EN ISO/IEC 17025 Test and Calibration Laboratories			✓		
Competence of TS EN ISO/IEC 17025:2010 Experimental Laboratories					✓
ISO 27001 Information Security Management System		✓	✓		✓
ISO 45001 Occupational Health and Safety Management System	✓	✓	✓	✓	✓
Authorized Liability Certificate			✓		✓
International Cyanide Code Certificate					✓
<b>ACCREDITATION</b>					
TÜRKAK	✓	✓	✓	✓	✓
UKAS	✓				

# ETHICS MANAGEMENT

## GOVERNANCE

We organize our ethical values and the principles with which we must comply under the guidance of the "Nurol Ethical Policy and Rules". The Board of Directors is primarily responsible for the execution of the company's activities in compliance with the legal regulations and Nurol Ethical Policy and Rules. We consider compliance with our corporate values and ethical rules to be the responsibility of all our employees. In this context, we communicate our ethical policy and rules to all our employees.

### Principles of Policies and their Implementation

Our Code of Ethics and company culture dictate our basic understanding and behaviors in our business relationships and operations. These rules also explain the policies that determine risk management, the working principles, the principles of ethical behavior and the internal controls that must be followed in all fields of activity.

The "NUROL Code of Ethics", which is applicable to the entire NUROL Group, as well as third parties that act on their behalf and their employees, and which defines our common working principles and methods, guides employees in all activities, business and transactions.

The "Nurol Code of Ethics" includes the 10<sup>th</sup> Principle of the United Nations Global Compact (UNGC), entitled Anti-Corruption, among its basic ethical values.

These rules determine the ethical working principles and the rules with which every employee must comply, regardless of their location or title, and are valid for everyone working at NUROL.

Regardless of their title or position, all Nurol Holding employees must act in accordance with ethical rules in their contacts and relations with all our stakeholders. Acting in accordance with ethical rules is of vital importance in protecting NUROL's reputation and success. We take our ethical rules as a guide in all our activities and embrace them at a level that can set a positive example for the society in which we live. In line with this understanding, we carefully avoid any behaviors that will negatively affect our corporate identity. Our ethical rules and working principles consist of five basic principles.



Our NUROL Code of Ethics is laid out under the following headings:

- Human resources and employee relations
- Relations with customers, suppliers and contractors
- Safety and protection of assets
- Protection of NUROL's information
- Anti-fraud, accurate accounting and accuracy of company records
- Conflicts of interest
- Honest communication with society and the media
- Occupational health and safety
- Product quality and safety
- Environmental awareness
- Respect for, and compliance with the law
- Anti-corruption and bribery
- Facilitation payments
- Gifts, representation and entertainment
- Consultants
- Working with partners and other business arrangements
- Lobbying, political support and political donations
- Sponsorship
- Disaster management
- Risk management
- Operational assurance statement
- Social responsibility and volunteering
- Compliance with Sanctions and Embargoes
- Charitable donations
- Reporting violations.

## Ethical Violations

We have a notification mechanism in place for the reporting of violations of Nurol's Ethical Policy and Rules, and the disciplinary rules and sanctions to be applied are defined. In cases of non-compliance with the Ethics Policy and Rules and violations, all our employees are obliged to report the issue to the authorized person and/or the General Manager of the Company, NUROL's corporate website ([www.nurol.com.tr](http://www.nurol.com.tr)), the e-mail address [etik.bildirim@nurol.com.tr](mailto:etik.bildirim@nurol.com.tr), the Ethics and Disciplinary Committee or the Ethics and Discipline Committee. Reports can be made anonymously by phone via our Ethics Line at 0 312 455 10 05.

In terms of security, the confidentiality of the notifying person is protected and objectivity and compliance, with the following of ethical rules throughout the process being considered critical. Any deliberate false reporting detected is considered a violation of the Ethical Code. The NUROL Ethics and Disciplinary Committee has defined the necessary mechanisms for the avoidance of any violations of the ethical rules within the Working Procedures and Principles Regulation. All violations and investigation results are shared with the "Ethics and Disciplinary Committee" and the "Holding Board of Directors", respectively. During the reporting period, no violation of the ethical principles and rules was identified.

## Ethics and Discipline Committee

The Nurol Ethics and Discipline Committee focuses on the adoption of ethical rules and the successful implementation of reputation management through continuous improvement. The committee, whose members include the Human Resources Coordinator, the Holding's Chief Legal Advisor, the Holding's Human Resources Manager and two people from the Internal Audit Department, acts in accordance with the "NUROL Holding Ethics and Disciplinary Committee Working Procedures and Principles Regulation". With the establishment of the committee, awareness-raising activities have been increased to ensure the adoption of the ethical rules within the company. The entry into force of the rules is under the responsibility of the NUROL Holding Board of Directors, while the NUROL Ethics and Discipline Committee (EDC) is responsible for their implementation. The Holding Board of Directors and the EDC review the Code of Ethics at least once a year in order to develop policies. The EDC notifies the results of its review and its recommendations to the Board of Directors.



## NUROL GROUP CAREER & LIFE

### HUMAN RESOURCES

Our Group has a structure that adheres to company tradition, and closely follows and keeps up with developments in the business world. We see our employees as the bearers of our traditions and values, and as members of our family. We know that behind our company's success is the wholehearted dedication of our qualified employees. At NUROL, we have determined the goal of our human resources strategy to be the continuous improvement of the competences of our human resources, and advances in knowledge and achievements through education and gender equality.

We operate in many different geographies and sectors with a common understanding and service quality, and for this, we consider our greatest asset to be our qualified human resources. Our approach to the achievement of business success involves the creation of highly qualified human resources that attach importance to teamwork, that believe in team spirit, that make the most effective use of time, that have a high sense of social responsibility and that are devoted to the company.

We care about the transparent transfer of corporate experience and knowledge, and we reflect this knowledge on our new products and in our understanding of business. In order to realize this successfully, we hold periodic meetings and use written communication channels. We believe that our achievements in terms of sustainability will be directly proportional to the investments we make in people. It is one of the success criteria of our company to ensure all of our employees have this awareness, and that they lead the processes under their responsibility with this awareness. On this point, it is our priority to ensure employee satisfaction by offering a contemporary,

peaceful and stable working environment. We believe that feeding from different perspectives will bring power to the determination of company strategies, following a career management approach that is fair and that offers equal opportunities to its employees. We ensure the participation of employees in the determination of strategies in line with the article "Decent Work and Economic Growth" of the United Nations Sustainable Development Goals.

### WORKING LIFE

In our career planning processes, we adopt a people-oriented approach that prioritizes individual talent and career development, thus ensuring employee satisfaction and managing employee turnover rates. Among the Nurool companies, operating over a very wide area, there are opportunities for the horizontal and vertical transfer, and these opportunities are supported by the Holding. Tasks that have a high impact on our business performance are defined as critical positions as a result of risk assessment, and assignments for these positions are based on criteria based on business success, performance level and competency-based selection made within the group. In our performance evaluations, we focus on the career development of our employees and work to ensure that they gain the necessary competencies and skills as future managers. Nurool Holding's emphasis on education, arts and foundation studies outside of work is the most obvious proof that success is considered only in terms of the business results of the company. Believing in the importance of the development of intellectual and creative capacity, we support the self-development of our employees in line with their long-term goals.

### Our expectations from each employee in NUROL are:

- **Respect for the work and time of co-workers, and efforts to engage in good-faith communication. Fulfillment of what is expected of them in a timely, understandable and correct manner.**
- **Respect of differences, and avoidance of discrimination based on age, sex, language, religion, race or political view. The understanding that this should be adopted in all communications, both within and outside the company.**
- **Acting with transparency, fairness and responsibility, and being accountable for ones actions.**
- **Acting in line with the company's goals and strategies, and contributing to the creation of an environment of team spirit.**

The evaluation of all our stakeholders and employees as honorable individuals is under the assurance and control of Nurool. Behaviors contrary to human dignity are unacceptable within the community. Employees are evaluated on the basis of work efficiency, regardless of race, religion, age, physical condition, gender and sexual orientation, in line with the legal requirements. All of our employees have access to the same fringe benefits and, in addition to the rights granted by law, optional private health insurance is provided to all employees.

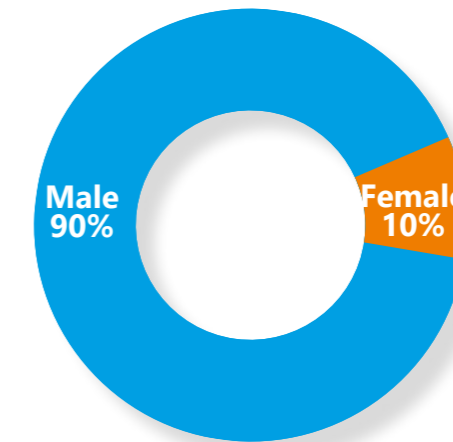
***A master is someone who teaches his/her apprentices all that he/she knows while continuing to learn new things that can be taught the following day.***

**Nurettin ÇARMIKLI**

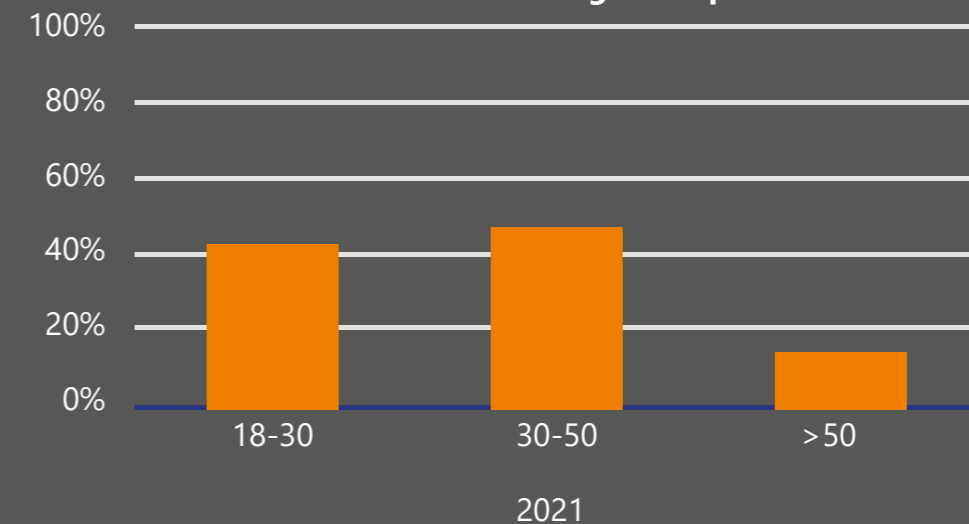
### EMPLOYEE PROFILE

Our demographics and human resource targets based on average data for the reporting period, along with other information, are shared in the tables below.

**New hires by gender**



**New Hires and Age Groups**



## COMMUNICATION RULES

Nurol Şirketler Topluluğu olarak, iç ve dış paydaşlarımız ile iletişim ve bilgi alışverişini belirli kurallar ve mevzuat As the Nurol Group of Companies, we communicate and exchange information with our internal and external stakeholders in accordance with certain rules and regulations. In our communication processes, in which we target continuous improvement, our aim is for employees and units to work in harmony and coordination with each other, and to resolve problems as soon as possible, as a result of which our creative power is revealed, and sustainability is assured. Environmental awareness and social benefit are the basic drivers of our communication policies.

We respect the personal and commercial rights of third parties and institutions and attach special importance to the protection of personal data, and all of our employees are obliged to comply with the legal regulations related to these issues.

### Communication Activities and Rules Related to Internal Stakeholders:

Internal communication plays a special role in the adoption of our vision and mission with a common understanding, and in the realization of our business strategies and goals, while contributing also to an increase in organizational efficiency. Timely, accurate, understandable, regular and targeted communication is an important contributor to our successes in these areas.

The primary communication activities with internal stakeholders include:

- Internal publications, intranet posts and announcements
- Meetings and meeting minutes
- E-mails
- Social responsibility activities, non-business social partnerships and social club activities
- Celebrations
- Condolences
- Notifications of entries and departures to/from the company

Social activities are arranged by the Public Relations department with the approval of the Coordinatorship, and these activities are announced to the employees via the NUROL intranet and e-mail.

### Communication in Emergencies:

In the event of an Emergency (accident, fire, flood, sabotage, state of emergency, dangerous situation in production, etc.), the Holding and Group Companies determine who to contact, how and when, and define the processes required for internal and external communication. In such cases, the Coordinatorship is also informed without delay. In addition, "Emergency Analyses and Risk Assessments" made periodically by the Group Companies are presented at the Board of Directors meetings.

### Communication Rules with External Stakeholders:

Correct, understandable, regular and planned external communication plays an important role in shaping the trust and reputation of NUROL. The main channels of communication with external stakeholders are the following, covering all external communications:

- Public statements
- Advertising, sponsorship, social responsibility activities, donations, advertisements, brochures and other promotional printed materials
- Activity reports
- Correspondence
- Social media
- Fair, congress, workshop, etc. activities
- Statements and disclaimers against unfounded news

Press releases, press conferences, public statements made upon requests for information and interviews by the press about NUROL, explanations of all kinds of intellectual property rights, trademark and patent rights and applications,

information and announcements about NUROL's shareholders, board of directors and managers, covering information and announcements about NUROL's collaborations, mergers, purchases, acquisitions, outsourcings and restructurings. Advertising, sponsorship, social responsibility, donations, advertisements, brochures and other promotional printed materials are produced as specified in the NUROL Corporate Identity Guide. In these activities, we act with the awareness of social responsibility. Annual Reports and Sustainability Reports submitted to shareholders, investors and the public are prepared under the coordination of the Human Resources and Public Relations Coordinator, and with the knowledge of the Holding Board of Directors.

In all external communication activities, it is essential to use the corporate color samples, brand and logo standards, presentations, bulletins and correspondence samples as detailed in the Corporate Identity Guide, and to include trademarks and copyrights and warnings in all materials used. It is essential to conduct modern, effective and widespread social media activities, including publications, sharing, and magazines distributed over the website, social media and communication tools or in print, and the use of social media networks and content supply is done by the Coordinatorship. NUROL employees include NUROL cannot give activities, information, working conditions, brand and logo in their participation and sharing in social media and communication sites, company or personal blogs, video and photo sharing sites, discussion groups and forums, or all social media networks including online dictionaries and encyclopedias.

While accessing the social media networks owned and managed by NUROL, employees must follow the principles stated above. NUROL does not make any announcements or explanations regarding the news in visual and written media, and no comments or responses are made to news or statements based on gossip or rumors about NUROL. If deemed necessary for the protection of NUROL's interests, however, the Coordination Office shall make the necessary disclaimers or launch legal proceedings in response to such unfounded news. The Corporate Communications Rules cover all NUROL employees, and any acts against these rules constitute a disciplinary offense that can lead to dismissal. Violations are subject to disciplinary action.





## CORPORATE SOCIAL RESPONSIBILITY

## CORPORATE SOCIAL RESPONSIBILITY

### OUR CORPORATE SOCIAL RESPONSIBILITY AWARENESS

Our corporate social responsibility awareness is one of the fundamental dynamics driving the development of our sustainability strategy and shapes our sustainability management activities. We share the quality and trust we build with our stakeholders, who know us closely, with other stakeholders in our value chain through corporate social responsibility projects. We continue to touch the lives of thousands of people with our projects developed in line with the United Nations Sustainable Development Goals. While developing our projects in line with our sustainability strategy, we focus on aligning our sustainability strategy with our business strategies. With the harmony we have created, we ensure that all our social responsibility projects are long-term and permanent.

In the field of "Qualified Education", which is among the Sustainable Development Goals, Nuro Holding supported the education of numerous students during the reporting period. We achieved this through the schools we

established and the scholarships we provided to students. As a company that aims to achieve global success and growth, we know that qualified manpower that raised in our own country is important for the development of society. In this context, with the investments we make in the field of education, we also aim to provide our scholarship holders with a talent through which they can generate a lifetime income, and to ensure that the lives we touch reach economic prosperity.

Our interactions and communication with our stakeholders serve as a roadmap for our continuous development and sustainability management practices. The arts, as an indispensable element of social life, are also an effective communication method with our stakeholders. The respect and value shown to diversity is an indispensable element of our cultural development. In addition to education, environmental protection and social initiatives, the Nuro Family continues to support the arts, as we have in the past.



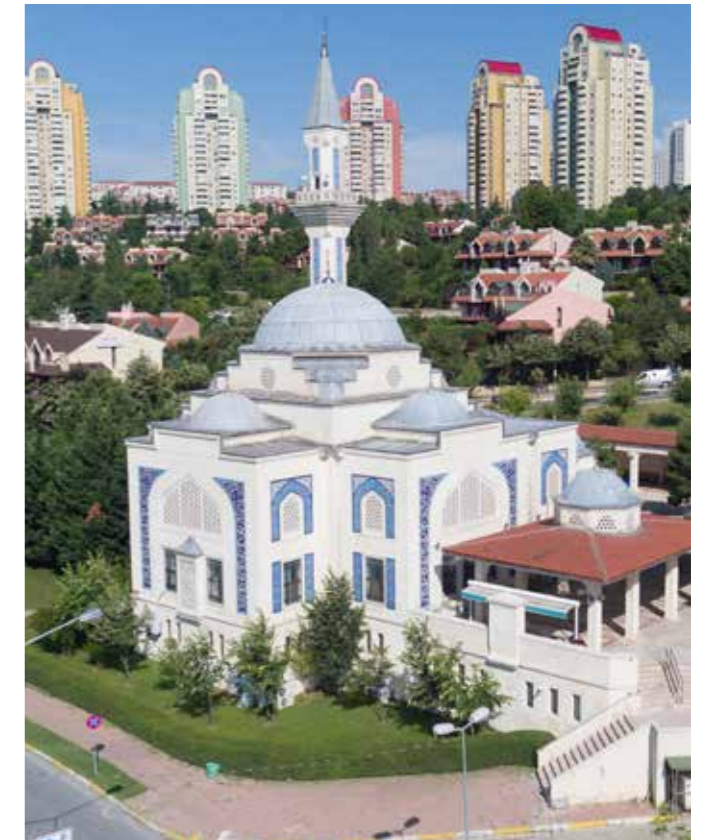
### THE NUROL EDUCATION, CULTURE, AND SPORTS FOUNDATION

The NUROL Education, Culture, and Sports Foundation, operating in Ankara, meets all its financial needs through cash donations and from the real estate donated by its founders, Nurettin ÇARMIKLI, Erol ÇARMIKLI and M. Oğuz ÇARMIKLI, and carries out its activities with the transfers made by the Nuro Group Companies every year in addition to the returns of the assets in its portfolio. NUROL attaches importance to activities aimed at increasing societal wellbeing as a part of the company culture and values that date back fifty years, and continues to support contemporary education, sports, culture, and the arts to create a better future.



The NUROL Foundation, with a sense of social responsibility, attaches importance to provide sustainable benefits through its contributions to the academic and cultural development of young people. In this sense, successful students with insufficient financial resources are given scholarships at various educational levels and their academic progress is closely monitored. Schools, libraries, sports facilities, conference halls, as well as theaters and cinemas, were built under the auspices of the Foundation and donated to the Ministry of National Education along with their furnishings and landscaping. These facilities are still in use today and serve the Turkish people.

The NUROL Education, Culture, and Sports Foundation, which was established by the ÇARMIKLI Family in 1996, is continuing its activities unabated with the goal of developing country's national culture, while protecting our connections with the past and contributing to efforts aimed at helping our country attain the level of a contemporary civilization, allowing it to take its well-deserved place in the international arena. The Foundation is managed by the Board of Directors, and has five members, and acts upon the approval of the decisions made by the members of the Board of Trustees for the purposes stated in the corporation charter.





The NUROL ART GALLERY, which was inaugurated in 1992, continues to serve as a venue where Ankara art enthusiasts and the original artworks of artists come together, and where emerging artists have the chance to exhibit their works. With the organization of creative workshops, interviews, signing sessions, and panels in addition to its exhibitions, the Nurol Art Gallery has established itself as the most prestigious and preferred culture and art venue in Ankara.

The NUROL Foundation has not only supported the production of several books and documentaries with the funding it provides but has also played an active role in reaching a large audience with the arts and cultural initiatives it has realized. Ottoman history researcher, author, and musicologist Emre Aracı, who is supported by the Foundation, successfully represents our country abroad with his albums, books, concerts, as well as his conferences all over the world.



### THE NUROL ART GALLERY

The Nurol Art Gallery, which was established in April 2002 under the auspices of the Nurol Education, Culture, and Sports Foundation, has hosted many notable artists throughout time and has earned the respect of art enthusiasts by putting in a lot of time and effort over the years. Our gallery's ability to contribute to the Foundation's scholarship fund and thereby support the education of talented young people is one of its most significant roles. During the pandemic, we did not leave our artists and art lovers alone due to the pandemic restrictions and carried out art related activities. During this period, we continued our activities and supported our artists, especially through virtual platforms.

The Grand Master Nuri İyem's exhibition served as the gallery's official opening exhibition, and over the course of the last 18 years, it has hosted almost 150 solo and group exhibitions. The gallery has exhibited the works of several notable artists throughout this time, including Bedri Rahmi Eyüboğlu, Ercüment Kalmık, Mehmet Güler, Aydın Ayan, Mevlut Akyıldız, Mehmet Güler, Bedri Baykam, Turan Erol, Habip Aydoğdu, Christo Yotov, Duran Karaca, Adnan Turani, Hikmet Çetinkaya, Hayati Mısmar, and Kuo Hsin-i. Our gallery hosts at least eight shows each year, including artwork by emerging artists, in addition to the master names that are notable representatives of the Turkish Plastic Arts. Our gallery attaches importance to including original artwork in the exhibitions, and it has adopted the mission to support young artists by organizing exhibitions with fine arts students at universities and to open exhibitions as part of welfare activities.



In addition to exhibitions, the gallery, which has 120 square meters of exhibition space, organizes concerts and talks, book signing and promotion days, conferences, and workshops, and strives to develop into a real art center. In line with this goal, painting activities are also carried out under the roof of Nurolatölye and new talents are discovered. Especially Mehmet Güler and Bihret Mavitan books prepared for the artists whose exhibitions we have opened, as well as many exhibition catalogs have been published and are in our archives.

In recent years, as the Nurol Art Gallery, we have been participating in national and international art fairs. In particular, the International Ankara Art Fair, which featured more than 100 galleries from 15 countries and attracted approximately 40 thousand people, was very fruitful for both our artists and our gallery. To give Turkish artwork a global presence, the Nurol Art Gallery collaborated with the Ministry of Foreign Affairs to organize exhibitions of Adnan Turani in New York and Işıl Özışık in Taiwan. It also participated in the Florence Biennale and took pride in serving as a bridge between Turkish artists and international artists. Since its establishment, Nurol Art Gallery has contributed to many collectors with works by Turkish and foreign artists, and Nurol has a very special collection of valuable artwork.



## PERFORMANCE INDICATORS



**OHS management in accordance with international standards and legal requirements**

2021		Sayı	Ratio (%)
Nurol Holding	Those involved in such a system, including subcontractors	153	100%
	Persons included in such a system and supervised by the Authority, including subcontracted workers.	153	100%
	Persons who are included in such a system and supervised by the Authority, including subcontracted workers.	153	100%
	Total number of employees	153	100%
Nurol İnşaat ve Ticaret	Those involved in such a system, including subcontractors	3166	100%
	Persons included in such a system and supervised by the Authority, including subcontracted workers.	3166	100%
	Persons who are included in such a system and supervised by the Authority, including subcontracted workers.	2763	82%
	Total number of employees	3166	100%
TÜMAD- İvrindi	Those involved in such a system, including subcontractors	1145	100%
	Persons included in such a system and supervised by the Authority, including subcontracted workers.	1145	100%
	Persons who are included in such a system and supervised by the Authority, including subcontracted workers.	1145	100%
	Total number of employees	1145	100%
TÜMAD-Lapseki	Those involved in such a system, including subcontractors	685	100%
	Persons included in such a system and supervised by the Authority, including subcontracted workers.	685	100%
	Persons who are included in such a system and supervised by the Authority, including subcontracted workers.	685	100%
	Total number of employees	685	100%
FNSS	Those involved in such a system, including subcontractors	1135	100%
	Persons included in such a system and supervised by the Authority, including subcontracted workers.	1135	100%
	Persons who are included in such a system and supervised by the Authority, including subcontracted workers.	1135	100%
	Total number of employees	1135	100%
Nurol Makina	Those involved in such a system, including subcontractors	544	100%
	Persons included in such a system and supervised by the Authority, including subcontracted workers.	544	100%
	Persons who are included in such a system and supervised by the Authority, including subcontracted workers.	544	100%
	Total number of employees	544	100%
Nurol Teknoloji	Those involved in such a system, including subcontractors	120	0%
	Persons included in such a system and supervised by the Authority, including subcontracted workers.	120	0%
	Persons who are included in such a system and supervised by the Authority, including subcontracted workers.	120	0%
	Total number of employees	283	0%

		Nurol Holding	Nurol Construction	Nurol Makina	FNSS	Nurol Teknoloji	TÜMAD
		2021					
Total Annual Working Hours		0	4.890.484	7.251	1747448	17550	4.872.292
Occupational Injuries	Employee (Integer)	0	157	10	12	13	19
	Subcontractor (Integer)	0	71	0	1	0	6
	Total (Integer)	0	228	10	13	13	25
	Ratio of the Total	0	46,62	0,0013	7,44	740,7	5,13
Serious Injuries	Employee (Integer)	0	84	3	22	0	12
	Subcontractor (Integer)	0	41	0	0	0	5
	Total (Integer)	0	125	3	22	0	17
	Ratio of the Total	0	25,56	0,00041	12,59	0	3,49
Occupational Fatalities	Employee (Integer)	0	0	0	0	0	0
	Subcontractor (Integer)	0	1	0	0	0	0
	Total (Integer)	0	1	0	0	0	0
		0	0,20	0	0	0	0

Age Distribution of the Board of Directors	<30 years of age			30-50			>50 years of age		
	2019	2020	2021	2019	2020	2021	2019	2020	2021
Nurol Holding	-	0	0	-	%33	%33	-	%67	%67
Nurol Construction	--	0	%23	-	%50	%60	-	%50	%17
Nurol Makina	-	0	0	-	0	0	-	0	0
FNSS	-	0	0	-	0	%33	-	0	%67
Nurol Teknoloji	-	0	%44	-	0	0	%47	0	%9
TÜMAD	-	0	0	-	0	0	-	0	0

Number of Employees	White Collar						Blue Collar					
	Male			Female			Male			Female		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
Nurol Holding	91	96		58	57		-	-	-	-	-	-
Nurol Construction	161	200	231	24	41	58	654	1156	1275	37	21	22
Nurol Makina	201	208	224	52	54	58	301	286	262	0	0	0
FNSS	516	481	450	162	148	149	361	338	363	1	1	1
Nurol Teknoloji	63	81	67	22	28	33	43	143	182	2	7	14
TÜMAD	199	268	285	53	68	75	518	523	554	28	35	39

Number of Employees	Full Time						Part Time					
	Male			Female			Male			Female		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
Nurol Holding	88	93		57	56		3	3		1	1	
Nurol Construction	531	1355	1505	27	62	80	1	1	1	0	0	0
Nurol Makina	502	494	486	52	54	58	0	0	0	0	0	0
FNSS	870	816	810	162	417	148	7	338	3	1	1	2
Nurol Teknoloji	106	217	249	24	33	47	3	7	8	0	2	6
TÜMAD	717	791	839	81	103	114	0	0	0	0	0	0

Number of Employees	Turkey						Overseas					
	Male			Female			Male			Female		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
Nurol Holding		91	96		58	57	0	0	0	0	0	0
Nurol Construction	213	1021	1233	26	46	66	319	335	273	1	16	14
Nurol Makina	502	494	486	52	54	58	0	0	0	0	0	0
FNSS	877	819	813	163	149	150	0	0	0	0	0	0
Nurol Teknoloji	109	224	258	24	35	52	0	0	0	0	0	0
TÜMAD	717	791	839	81	103	114	0	0	0	0	0	0

Number of Employees	Fixed Term						Indefinite Term					
	Male			Female			Male			Female		
	2019	2020	2021	2019	2020	2021	2019	2020	2021	2019	2020	2021
Nurol Holding	-	91	96	-	58	57	-	0	0	0	0	0
Nurol Construction	0	287	294	0	16	14	532	46	66	27	1069	1212
Nurol Makina	0	0	0	0	0	0	502	494	486	52	54	58
FNSS	33	23	22	6	5	6	844	144	791	157	796	144
Nurol Teknoloji	3	54	0	0	12	0	106	23	258	24	170	52
TÜMAD	0	0	0	0	0	0	717	791	839	81	103	114



Employee Turnover Rate		Nurol Holding	Nurol Construction	Nurol Makina	FNSS	Nurol Teknoloji	TŪMAD		
Male	<30 years of age	2019	Number	0	67	10	11	37	28
		2019	Total	0%	17%	1,80%	5,50%	27,82%	13,66%
		2020	Number	1	0,0481	8	7	56	35
		2020	Total	33%	4,81%	1,47	4%	25%	15,3
		2021	Number	0	225	24	15	9	14
		2021	Total	0%	14,2%	4,38%	21,4%	8%	5,5%
	Aged 30-50	2019	Number	0,0519	232	14	27	56	46
		2019	Total	41%	53%	1,80%	4,60%	42,11%	10,11%
		2020	Number	4	0,0863	17	21	45	39
		2020	Total	7%	8,63%	3,12	3%	20%	7,8
		2021	Number	10	399	24	36	5	38
		2021	Total	17%	25,2%	4,38%	51,4%	4%	7,4%
Aged over 50	2019	Number	0,0307	95	1	5	13	9	
	2019	Total	29%	32%	0,20%	6,30%	9,77%	15,79%	
	2020	Number	1	0,0166	5	0	10	7	
	2020	Total	3%	1,66%	0,92	0%	4%	10,8	
	2021	Number	4	85	1	2	0	7	
	2021	Total	13%	5,4%	0,18%	2,9%	0%	10%	
Female	<30 years of age	2019	Number	0,0074	4	2	5	13	4
		2019	Total	6%	2%	0,40%	7,20%	9,77%	11%
		2020	Number	1	0,0022	3	3	9	2
		2020	Total	33%	0,22%	0,55	5%	26%	4,3
		2021	Number	0	3	8	8	1	3
		2021	Total	0%	0,2%	1,46%	11,4%	4%	5,8%
	Aged 30-50	2019	Number	0,0148	6	0	4	10	3
		2019	Total	12%	14%	0%	5%	7,52%	8%
		2020	Number	3	0,0004	1	5	8	3
		2020	Total	7%	0,04%	0,18	6%	23%	6,25
		2021	Number	5	12	3	9	3	5
		2021	Total	13%	0,8%	0,55%	12,9%	14%	9,6%
Aged over 50	2019	Number	0,0148	2%	0	1	1	0	
	2019	Total	12%	1%	0%	11,10%	0,75%	0%	
	2020	Number	2	0,0004	0	0	0	0	
	2020	Total	15%	0,04%	0	0%	0%	0	
	2021	Number	3	0	0	0	0	1	
	2021	Total	21%	0,0%	0,00%	0%	0%	%3	



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