

EFOR YATIRIM SANAYİ TİCARET A.Ş.

OCCUPATIONAL HEALTH AND SAFETY (OHS) POLICY

As **Efor Yatırım**, we prioritize protecting the health and safety of our employees, sub-contractors/suppliers, and visitors above all our business objectives. We commit to creating a safe working environment that prevents harm, encourages learning, and is psychologically secure while conducting our activities.

Scope and Field of Application

This policy applies to all office, field, and project-based activities of Efor Yatırım, as well as works carried out on behalf of the company (including sub-contractors/third parties). The provisions of the policy are implemented through workplace rules and relevant procedures.

Our Core Principles

- To comply with legal legislation and applicable standards, and to go beyond legal requirements when necessary.
- To eliminate hazards; if not possible, to reduce risks at their source and implement effective controls.
- To act with the understanding that all accidents and occupational diseases are preventable.
- To strengthen employee participation; to take feedback from the field into account and support open communication.
- To report incidents, near-misses, and hazards without delay; to take permanent action through root cause analysis.
- To set targets with a continuous improvement approach, monitor performance, and report transparently.
- To share the same OHS expectations with sub-contractors and suppliers and verify them in the field.

1. Management Commitment and Leadership

Management provides the necessary resources (personnel, equipment, time, budget) for the implementation of the OHS management system. Managers lead by example and are responsible for ensuring OHS compliance within their teams.

2. Hazard Identification and Risk Management

Risk assessments are conducted for all activities. The hierarchy of controls (Elimination, Substitution, Engineering Controls, Administrative Controls, and Personal Protective Equipment - PPE) is applied to keep risks at an acceptable level. Risk assessments are updated in case of changes (new equipment, process changes, etc.).

3. Competence and Training

Occupational health and safety trainings suitable for the nature of the work and legal requirements are provided. It is ensured that employees and relevant third parties are aware of the risks and rules related to their work.

4. Incident Investigation and Action Management

All occupational accidents and near-misses are reported; they are handled with an approach of comprehensive investigation, root cause analysis, and sharing of lessons learned. Corrective/preventive actions are planned, implemented, and their effectiveness is verified.

5. Sub-Contractor and Supplier OHS Management

OHS plans suitable for the risks of the work, training records, and necessary documents are requested from sub-contractors and suppliers. Site entry conditions, permit processes, PPE, and critical work controls are defined; compliance is verified through audits and observations.

6. Emergency Preparedness

Emergency plans are prepared for scenarios such as fire, earthquake, injury, chemical spill (if any), and similar; teams and responsibilities are determined. Drills are conducted at regular intervals; plans are updated according to the results.

7. Health Surveillance

Health surveillance suitable for the nature of the work is conducted; practices supporting employee health, including ergonomics, working conditions, and psychosocial risks, are developed.

8. Performance Monitoring and Audit

OHS performance is monitored through targets and indicators (e.g., accident rates, near-miss reports, audit findings, training completion rates). Internal audits and field checks are carried out; findings provide input for management reviews.

This policy enters into force with the approval of the senior management. It is reviewed and updated at least once a year or in case of significant changes and shared with the relevant parties.

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