HALK GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş.

SUSTAINABILITY POLICY

1. PURPOSE AND SCOPE

Halk Gayrimenkul Yatırım Ortaklığı A.Ş. (Halk GYO), acting with a sense of corporate and social responsibility, aims to carry out activities that create value for the national economy and the real estate sector in a sustainable manner, sensitive to society and the environment, in order to leave a livable world for future generations.

With the social responsibility it has undertaken, Halk GYO continues its activities in the fields of environment, social issues, and governance in line with sustainability principles. In the projects it undertakes, the Company implements innovative projects that minimize environmental risks; ensure efficient use of water and energy; use recyclable materials; enable the recycling of waste generated during construction; and providing customer satisfaction.

Halk GYO has adopted as its sustainability strategy respect for the ecological and biological environment; sensitivity to all stakeholders, laws, regulations, and corporate ethical values; transparency and accountability in line with the Company's vision and mission; developing its real estate portfolio with a focus on commercial properties that generate high rental income to create value for its shareholders; and gaining a reputable place in the real estate sector as a leading institution.

The Company has set as its strategic objectives alignment with our country's 2053 Net Zero Emission target and contribution to the transition to a low-carbon economy.

This policy covers the Company's activities and all its employees.

2. PRINCIPLES AND FUNDAMENTALS

• In accordance with its corporate culture and identity, it considers sustainability holistically with its economic, environmental, and social dimensions in activities, decision-making, and implementation processes, along with laws and regulations. It considers the potential impacts of its activities within the scope of sustainability and ensures effective management of potential risks.

• It conducts its activities in compliance with occupational health and safety laws and regulations, providing its employees with a healthy, safe, and modern working environment; based on respect for human and labor rights; grounded in ethical values; and ensuring equal opportunity without discrimination based on language, religion, race, gender, marital status, sect, etc.

• In all its activities, Halk GYO acts with a "zero tolerance" approach against bribery and corruption, ensuring compliance with laws and regulations covering bribery and corruption, universal legal rules, and ethical and professional principles.

• It takes necessary steps to establish sustainability awareness within the organization and in society at large. In this context, it creates a corporate culture that internalizes sustainability. By prioritizing investments that will contribute to the national economy, environmental, and social development, it develops its products and services accordingly.

• It provides information on sustainability-related activities to the public and stakeholders. It considers the values of its stakeholders regarding sustainability in its business processes and takes initiatives to involve stakeholders in sustainability efforts.

• To contribute to combating global climate change, it sets targets to reduce greenhouse gas emissions and implements the necessary actions. It takes the necessary measures to effectively manage resource use.

• It follows national and international developments in the field of sustainability and participates in sustainability efforts in cooperation with relevant institutions.

• It aims to actively take roles in national multilateral sustainability initiatives and cooperation platforms.

3. ENVIRONMENTAL AND SOCIAL IMPACT MANAGEMENT

In its long-term strategies, in determining targets and action plans, and in its operational processes, the Company is committed to managing environmental and social impacts.

With the aim of leaving a more livable world to future generations and being aware of its responsibility to the environment, the Company accepts as the basis of environmental impact management the continuous improvement of its environmental performance, minimizing potential adverse impacts of its activities, preventing environmental pollution, and using resources in compliance with laws and regulations without disrupting the natural balance.

In managing environmental and social impacts, the Company adopts the following principles:

• It complies with environmental and national regulations and other obligations in the places where it operates and cooperates with relevant units when necessary.

• It operates its environmental management system in compliance with ISO 14001 Environmental Management System standard and Zero Waste regulation and works to continuously improve the system.

• It evaluates and manages climate-related risks arising both from direct operations and its portfolio.

• It sets targets and action plans to reduce adverse environmental impacts from its activities and provides the necessary financial, human, and technological resources to achieve these targets.

• It calculates greenhouse gas emissions arising from its activities and develops and reports mitigation strategies related to emission management.

• It raises awareness of its employees, suppliers, and customers about climate change and sustainability and organizes trainings in this regard.

• In purchasing processes, it strives to control environmental impacts and to use environmentally friendly materials and technologies.

• It engages in activities that support sustainable development and social progress. It supports environmentally and socially responsible investments.

4. ENERGY MANAGEMENT

The Company aims to continuously improve energy consumption and reduce operation-related emissions through energy efficiency and saving practices.

In energy management, the Company adopts the following principles:

• It complies with legal regulations and other obligations in the places where it operates and cooperates with relevant units when necessary.

• It operates its energy management system in compliance with ISO 50001 Energy Management System standard and other obligations and works to continuously improve the system.

• It continuously monitors energy consumption resulting from operations. Taking into account consumption variables, buildings, climatic conditions, and other possible effects, it aims to continuously improve its energy performance.

• It sets targets and action plans to improve energy efficiency and increase energy savings, and provides the necessary financial, human, and technological resources to achieve these targets.

• It supports the supply of energy-efficient products and services in purchasing processes and design activities that will improve energy performance.

• It raises awareness of its employees, suppliers, and customers on energy efficiency and savings and organizes trainings in this regard.

• In line with the 2053 net zero emission target, the Company aims to meet its electricity consumption from renewable energy sources.

5. WATER MANAGEMENT

In its long-term strategies, in determining targets and action plans, and in its operational and activity-related processes, the Company aims to manage the efficient use of water.

Within the framework of the water management planning it has established, by observing the right to access clean and safe water, the Company aims to ensure:

• Compliance with all national environmental laws, obligations, and standards,

• Establishment of an effective and sustainable water management system against water risks and its effective implementation,

• Reduction of water consumption and water pollution and cooperation with stakeholders to ensure efficient use of water,

• Ensuring the quality and sustainability of water resources and broader water-related ecosystems under the guidance of the Sustainable Development Goals,

• Ensuring employees' right to access clean water and providing a healthy working environment,

• Ensuring that human rights are not violated in its activities and observing local communities' right to access clean water,

• Raising awareness of employees and stakeholders regarding water efficiency.

6. SUSTAINABLE PROCUREMENT MANAGEMENT

Halk GYO considers its stakeholders and business partners as an integral part of developing the Company's sustainability activities. Therefore, it expects its suppliers, while carrying out their activities,

• Adopt and fully comply with local regulations on combating climate change.

• Adoption of and full compliance with the Company's sustainability policies,

• Sensitivity to environmental issues and efforts to limit environmental impacts,

• Support for initiatives to make environmental sustainability more widespread,

• Support for the development and dissemination of environmentally friendly technologies,

• Emphasis on key sustainability-related issues such as combating climate change, environmental health, energy efficiency, quality, business ethics, human and labor rights, occupational health and safety; while prioritizing transparency, reliability, and honesty,

• Maximum effort to use environmentally friendly materials.

7. ENFORCEMENT

This policy text entered into force with the decision of the Board of Directors dated 22.08.2025 and numbered 1079, and the "Sustainability Committee" is responsible for the follow-up and implementation of the "Sustainability Policy."

The Sustainability Policy shall be revised and updated by the decision of the Sustainability Committee whenever deemed necessary.