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PRODUCT AND SERVICE SAFETY EMERGENCY RESPONSE AND TEST PROCEDURE



1. PURPOSE

The purpose of this procedure is to define the methods to be applied for identifying emergencies that may affect the safety of the products and services provided by Naturel Holding and its Subsidiaries (the "Holding"), responding to such emergencies, and regularly testing emergency response procedures.

This procedure aims to protect employees, contractors, visitors, relevant third parties, and the environment; support operational continuity; reduce potential safety risks; and remedy identified deficiencies.

2. SCOPE

This procedure covers the Holding's activities and relevant processes under its control. Contractors and other relevant service providers are also included within the scope where necessary.

The main activities within the scope include:

- Operation and maintenance of solar power plants (SPPs) and related technical services.
- Operation and maintenance of geothermal power plants (GPPs) and related site activities.
- Activities relating to electricity generation systems, electrical equipment, and energy transmission infrastructure.
- Drilling, well, and related field operations.
- Equipment failures, fires, explosions, electric shocks, hazardous gas releases, and similar emergencies that may affect product and service safety.
- Other relevant operations under the Holding's control or responsibility.

3. DEFINITIONS

Product and service safety: Measures intended to prevent the products and services provided by the Holding from posing unacceptable risks to employees, users, customers, third parties, or the environment.

Emergency: An unexpected event that may adversely affect human health, the environment, facility safety, energy generation, or the safety of the services provided.

Emergency response procedure: A document defining the duties, responsibilities, and activities to be carried out to bring an emergency under control, mitigate its effects, and restore safe conditions.

Emergency drill: A planned exercise conducted to assess the practicality, effectiveness, and level of preparedness of emergency response arrangements.

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Corrective action: An action taken to eliminate the cause of an identified nonconformity and prevent its recurrence.

4. RESPONSIBILITIES

4.1. Senior Management

- Provides the resources necessary to implement this procedure.
- Supports the implementation of emergency preparedness and response activities.
- Makes the necessary decisions regarding significant risks and critical deficiencies.

4.2. Quality Management Department

- Coordinates the documentation and revision processes for this procedure.
- Ensures that records relating to the testing of emergency procedures are maintained and monitored.
- Coordinates the evaluation of drill results and the follow-up of necessary corrective actions.
- Supports the retention of evidence and records requested as part of ESG assessments.

4.3. Occupational Health and Safety (OHS) Department

- Provides technical input into the identification of emergency scenarios.
- Coordinates the planning and execution of drills with the relevant site teams.
- Assesses potential impacts on human health, occupational safety, and the environment.
- Records drill results, deficiencies, and improvement needs.

4.4. Facility and Operations Managers

- Ensures the implementation of emergency response arrangements specific to the relevant facility or activity.
- Coordinates the participation of relevant employees and contractors in drills.
- Monitors the availability and functionality of emergency equipment through the relevant checks.
- Carries out the actions necessary to remedy identified deficiencies.

4.5. Sustainability Department

- Contributes to the assessment of emergency scenarios in terms of environmental and social risks.
- Assesses, together with the relevant departments, the impacts of significant environmental and social incidents on ESG performance, sustainability targets, and relevant reporting obligations.

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- Supports linking environmental incident records and corrective actions to relevant sustainability indicators.
- Supports the monitoring of relevant evidence that may be used in Green Taxonomy and DNSH assessments.
- Reports significant ESG risks and incidents to the relevant governing bodies using data obtained from independent organization reports and reports prepared by relevant departments.

4.6. Employees and Contractors

- Comply with the emergency rules and instructions communicated to them.
- Participate in relevant training sessions and drills.
- Report any hazards and safety gaps they identify to the relevant responsible persons.

5. IMPLEMENTATION

5.1. Identification of Emergency Scenarios

Emergencies that may affect product and service safety are identified by taking into account risk assessments, past incidents, site observations, equipment characteristics, legal obligations, and the needs of relevant parties.

Depending on the activities, the following scenarios may be considered:

- Fire and explosion.
- Electric shock and critical failures in electrical systems.
- Failure of critical equipment or control systems.
- Hydrogen sulfide (H₂S) gas leaks or exposure to hazardous gases at geothermal sites.
- Loss of control, hazardous substance releases, or other critical incidents during drilling activities.
- Spills and leaks that may cause environmental pollution.
- Events that may interrupt energy generation or the safe provision of services.
- Other emergencies that may affect employees, contractors, customers, or third parties.

Scenarios are assessed according to the nature of each facility and activity. Scenarios that are not relevant are not applied; appropriate response arrangements are established for significant risks.

5.2. Environmental and Climate-Related Emergency Risks

When identifying emergency scenarios, potential adverse impacts on water resources, soil, air quality, biodiversity, and ecosystems are assessed alongside human health and operational safety.

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This includes environmental risks arising from geothermal fluid leaks, uncontrolled discharges, reinjection system failures, loss of well integrity, hazardous gas releases, chemical spills, and waste management.

Appropriate response scenarios are established by assessing the potential impacts of floods, extreme temperatures, drought, storms, wildfires, and other physical climate risks on facility safety, environmental performance, and operational continuity.

5.3. Establishment of Emergency Response Procedures

Response methods for the identified scenarios are prepared in alignment with the emergency plans and operational instructions of the relevant facility.

Where applicable, the procedures define the following:

- How the emergency will be identified and reported.
- How the incident will be communicated to the relevant responsible persons and emergency response teams.
- Allocation of duties and responsibilities.
- Steps for safe shutdown, energy isolation, and securing the area.
- Evacuation, assembly, and restriction of access where necessary.
- Communication with emergency services and relevant external organizations.
- Protection of employees, contractors, and third parties who may be affected.
- Checks and approvals required to resume work safely after the incident.

Response steps must comply with the relevant technical instructions and directions of authorized personnel. Unauthorized persons must not intervene in hazardous areas.

5.4. Prevention and Mitigation of Environmental Harm

Emergency response plans define measures to prevent environmental harm, control incidents at their source, and mitigate potential impacts.

For environmental incidents, the priorities are to prevent pollutants from spreading to water resources, soil, and natural habitats; implement the necessary isolation and leak-control measures; initiate appropriate environmental monitoring; and remediate affected areas.

Response and remediation activities are carried out in accordance with relevant environmental legislation, permit conditions, and applicable environmental standards.

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5.5. Testing of Emergency Procedures

Emergency response procedures are regularly evaluated through planned drills and other appropriate testing methods.

The purpose of testing is to ensure that procedures are not only documented but can also be used effectively in practice.

For this purpose:

1. An annual drill and testing plan is prepared, taking into account relevant risks and previous test results.
2. The scenario to be tested, scope, responsible persons, and participants are identified.
3. Necessary measures are taken to ensure that the drill does not turn into a real emergency and that participants remain safe.
4. The drill or test is conducted in accordance with the defined scenario and relevant response procedure.
5. Notification, communication, allocation of duties, evacuation, response, and coordination steps are evaluated.
6. Observations, successful practices, deficiencies, and improvement needs are documented.
7. Responsible persons and target completion dates are assigned for identified deficiencies.
8. The completion and effectiveness of corrective actions are monitored.

Tests are conducted at a frequency appropriate to the risk level and operational conditions of the relevant activity. Where legal requirements or facility-specific requirements call for more frequent testing, those requirements take precedence.

5.6. Types of Drills and Tests

One or more of the following methods may be used, as appropriate:

- Tabletop exercise: Assessment of responsibilities, decision-making mechanisms, and communication flows through a scenario.
- Field drill: Practical testing of evacuation, assembly, emergency notification, and response steps.
- Functional test: Inspection of alarm systems, communication channels, or emergency equipment in accordance with the relevant technical procedures.
- Coordination test: Assessment of communication between internal teams, contractors, and, where necessary, external emergency response organizations.

The type and scope of the test are determined according to the nature of the scenario. Relevant technical and occupational safety measures are applied to tests that require actual emergency equipment to be activated.

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5.7. Evaluation of Test Results

Results are evaluated after each drill or test.

The following criteria are considered during the evaluation:

- Timely identification and reporting of the emergency.
- Proper performance of duties by responsible persons.
- Functionality of communication channels and adequacy of information flow.
- Adequacy of evacuation and area safety measures.
- Functionality of emergency equipment and relevant systems.
- Employees' and contractors' awareness of the procedures.
- Coordination between response teams.
- Ability to control potential impacts on product and service safety.

Identified nonconformities, deficiencies, and areas for improvement are entered into the record form.

5.8. Corrective Actions and Improvement

Necessary corrective actions are initiated for deficiencies identified during testing.

Actions may include addressing training needs, updating procedures, remedying equipment deficiencies, improving communication processes, or reallocating responsibilities.

A responsible person or department and a target completion date are assigned to each action. The effectiveness of completed actions is evaluated.

Where necessary, the relevant emergency procedure, risk assessment, training plan, or site instruction is revised. The need for an additional drill or test following significant changes is assessed.

5.9. Training and Communication

Relevant employees and contractors are informed about emergency procedures according to their duties and the risks to which they may be exposed.

Training and communication activities cover topics such as:

- Reporting emergencies,
- Evacuation and assembly rules,

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- Duties and responsibilities,
- Relevant alarm and communication methods,
- Critical hazards specific to the activity,
- Participation in emergency drills

and other related topics.

Training and drill attendance records are retained.

5.10. Safety of Local Communities and Stakeholders

The Holding assesses the potential impacts of emergencies arising from its activities on local communities, neighboring businesses, and other relevant stakeholders.

In the event of significant emergencies, the principles are to inform potentially affected stakeholders accurately and in a timely manner, coordinate with competent public authorities and local emergency response organizations where necessary, and implement measures to protect public health and safety.

Stakeholder notifications and complaints relating to emergencies are recorded and evaluated through the relevant mechanisms, and necessary corrective actions are followed up.

5.11. Alignment with ESG and the Green Taxonomy

The Holding assesses environmental, social, and governance (ESG) risks holistically in its emergency preparedness and response processes.

In this context, the environmental impacts of relevant activities are assessed with regard to the environmental objectives under the Türkiye Green Taxonomy and the Do No Significant Harm (DNSH) principle.

Emergency management takes into account risks relating to climate change adaptation, water resource protection, pollution prevention, the circular economy, biodiversity and ecosystem protection, and employee and community safety.

Significant environmental and social incidents are recorded in accordance with relevant legislation, permit conditions, and reporting obligations, and are reported to the relevant governing bodies where necessary.

Records generated through these processes are used, where applicable, as supporting evidence for ESG ratings, sustainability reporting, and Green Taxonomy alignment assessments.

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6. RECORDS AND SUPPORTING DOCUMENTATION

The following records are created, where applicable, under this procedure and retained in accordance with the relevant document control rules:

- Emergency scenarios and risk assessments.
- Emergency response plans and procedures.
- Annual drill and testing plan.
- FR.UHG.001 Emergency Drill and Test Evaluation Form.
- Drill attendance lists and training records.
- Photographs of drills and other appropriate evidence.
- Test results and identified deficiencies.
- Corrective action records and effectiveness evaluations.
- Procedure revision records.

Record retention periods are determined by taking into account relevant legislation, the Holding's PR.KYS.001 Procedure for Preparation and Control of Documents and Records, and contractual obligations.

7. MONITORING AND PERFORMANCE EVALUATION

The effectiveness of emergency response preparedness may be monitored using the following indicators:

- Percentage of planned drills and tests completed.
- Number and types of deficiencies identified during tests.
- Percentage of corrective actions completed on time.
- Participation rate of relevant employees and contractors in drills.
- Recurring nonconformities and improvement needs.
- Number of significant environmental incidents (incidents/year).
- Uncontrolled geothermal fluid leaks (number and m³).
- Discharge incidents in breach of permit conditions (incidents/year).
- Emergency response time (minutes).
- Environmental incident reporting rate (%).
- Percentage of environmental corrective actions completed on time (%).
- Incidents affecting the local community (incidents/year).
- Contractor participation rate in drills (%).
- Drills covering critical climate risks (drills/year).

The results are evaluated by the relevant departments and, where appropriate, provide input to management review or ESG performance evaluation processes.

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