



POLICY 04 · KRB-POL-04

Occupational Health, Safety and Environment Policy



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4.1 Purpose

The purpose of this Policy is to define the fundamental principles and responsibilities to be applied in Karub Enerji's production, R&D, storage, assembly and field activities in order to protect the health and safety of employees, prevent occupational accidents and diseases, minimise environmental impacts and ensure the efficient use of natural resources.

The Company embraces the goals of "zero occupational accidents" and "zero serious environmental incidents" and positions occupational health, safety and environmental performance as a priority ahead of production and productivity targets.

4.2 Scope

This Policy covers all workplaces, production facilities, laboratory and R&D areas, warehouse and logistics operations, construction site and field assembly activities and offices of the Company, and all employees, subcontractor personnel, interns and visitors present in these areas.

4.3 Legal Basis and Management System

- Occupational Health and Safety Law No. 6331 and its secondary legislation
- Relevant provisions of Labour Law No. 4857
- Environmental Law No. 2872 and its secondary legislation
- Waste Management Regulation, Zero Waste Regulation and Regulation on the Control of Waste Electrical and Electronic Equipment
- Environmental Impact Assessment (EIA) Regulation and Environmental Permit and Licence Regulation
- Regulation on Health and Safety Measures in Work with Chemical Substances and the KKDİK (Turkish REACH) Regulation
- Regulation on the Protection of Buildings from Fire
- ISO 45001 Occupational Health and Safety Management System and ISO 14001 Environmental Management System standards

The Company manages OHS and the environment within an integrated, risk-based management system aligned with the ISO 45001 and ISO 14001 standards and based on continuous improvement.

4.4 Occupational Health and Safety Commitments

- ◆ Risk assessments are carried out at all workplaces and updated regularly, and priority is given to eliminating hazards at source (the hierarchy of elimination, substitution, engineering controls, administrative measures and personal protective equipment).
- ◆ An occupational physician and an occupational safety specialist are appointed; the Occupational Health and Safety Committee is established where required by law and meets regularly.
- ◆ Employees receive OHS training at the start of employment and periodically thereafter; pre-employment and periodic health examinations are carried out.
- ◆ Personal protective equipment is provided free of charge and its use is supervised.
- ◆ Permit-to-work and lock-out/tag-out (LOTO) procedures are applied for critical risks such as electric shock, working at height, lifting and handling, chemical exposure, thermal runaway and fire arising from lithium-ion batteries, laser and cutting equipment and work on energised systems.
- ◆ Periodic inspections and maintenance of work equipment are carried out by authorised persons and recorded.
- ◆ Emergency plans are prepared; fire, earthquake, chemical spill and evacuation drills are conducted regularly; first aid, search and rescue and fire-fighting teams are formed.
- ◆ All occupational accidents, occupational diseases and near-miss events are reported, root cause analysis is performed and corrective and preventive actions are implemented.
- ◆ Employees may exercise their right to refrain from working in the event of serious and imminent danger; no employee may be subjected to adverse treatment for exercising this right.
- ◆ Subcontractors and suppliers are obliged to comply with the Company's OHS rules; OHS orientation is mandatory at site entry.

4.5 Employee Health and Well-being

- ◆ Workstation arrangements are made to address ergonomic risks.
- ◆ Noise, vibration, lighting, thermal comfort and indoor air quality measurements are carried out periodically.
- ◆ Bringing addictive substances into the workplace and their use are prohibited; working under the influence of alcohol is not permitted.
- ◆ Psychosocial risk factors (excessive workload, mobbing, shift patterns) are assessed and measures are taken to reduce them.
- ◆ Information and counselling services are offered to support the mental well-being of employees.

4.6 Environmental Management Commitments

- ◆ Full compliance with environmental legislation and the required permit, licence and EIA obligations is ensured in all activities.
- ◆ Environmental impacts are assessed with a life-cycle approach from the product and process design stage onwards.
- ◆ Energy efficiency is increased; the aim is to meet the electricity needs of production facilities from renewable sources to the greatest extent possible.
- ◆ Water consumption is monitored and reduced; opportunities for the recovery and reuse of process water are evaluated. Rinsing and chemical process water used in photovoltaic cell and module production is treated in accordance with discharge standards.

- ◆ The hierarchy of prevention, reduction, reuse, recycling and recovery is applied in waste management; disposal is the last option.
- ◆ Hazardous waste (chemical waste, contaminated packaging, waste oils, scrap cell and module parts, waste batteries) is segregated, temporarily stored and delivered only to licensed companies in accordance with the legislation.
- ◆ Obligations regarding the collection and recovery of waste electrical and electronic equipment and waste batteries and accumulators are fulfilled; design choices that facilitate the recovery of products at the end of their service life are supported.
- ◆ A Zero Waste Management System is established and the Zero Waste Certificate is obtained and maintained.
- ◆ The procurement, transport, storage and use of chemical substances are managed on the basis of safety data sheets (SDS) and with due regard to KKDİK obligations.
- ◆ Air emissions, noise and wastewater discharges are measured regularly and kept below the legal limit values.
- ◆ Pollution prevention is fundamental; secondary containment and emergency response kits are kept available against leaks and spills.
- ◆ Greenhouse gas emissions are calculated, monitored and reduction targets are set; details are regulated in the Sustainability Policy.

4.7



Training, Participation and Communication

All employees receive OHS and environmental training at the start of employment and periodically thereafter. The consultation, suggestion and participation of employees and employee representatives in decision-making processes is ensured. Information on OHS and environmental performance is shared regularly through internal communication channels; environmental complaints and requests from interested parties are recorded and answered.

4.8



Responsibilities

- ◆ **Senior Management:** Provides the resources necessary for implementing the Policy, sets objectives and reviews performance.
- ◆ **OHS and Environment Department:** Conducts risk assessments, measurements, training, permit and licence processes and monitoring of legal compliance.
- ◆ **Department Managers:** Are responsible for keeping the hazards and environmental impacts in their areas under control.
- ◆ **Employees:** Are obliged to comply with the rules, use personal protective equipment and report hazardous situations and near-miss events.
- ◆ **Subcontractors and Visitors:** Are obliged to comply with the Company's OHS and environmental rules.

4.9



Audit, Performance Monitoring and Entry into Force

Internal audits and management reviews are conducted regularly. Performance is monitored through indicators such as accident frequency and severity rates, the number of near-miss reports, the number of lost-time accidents, training hours, the waste recovery rate, energy and water consumption per unit of production and the number of legal non-conformities. The Policy is reviewed at least once a year, updated where necessary and enters into force upon approval by the Board of Directors.

PREPARED BY

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APPROVED BY

Board of Directors.....
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