

1. Purpose and Scope

As KLINGER Turkey, we aim to secure our competitiveness by making sustainability an integral part of all our production and service processes, minimize the impact of our activities on the environment and society, and create long-term value for our stakeholders. We recognize access to clean air, water, and soil as a fundamental right; preventing pollution, minimizing energy and natural resource consumption, and reducing our carbon and water footprints are among our strategic objectives.

This policy has been prepared to translate the commitments set out in our Health, Safety and Environment Integrated Policy into applicable principles in the areas of environmental and energy management, and to establish a framework for setting our objectives and monitoring our performance. The policy covers all production, storage, shipment, maintenance and repair, procurement, and administrative processes carried out at our production facility located in the Istanbul Industrial and Trade Free Zone (Tuzla/Istanbul) and at our affiliated offices. Environmental responsibility is a shared responsibility of all parties, including our managers, employees, subcontractors, and suppliers. In addition to these parties, the policy also applies to our interns, business partners, and visitors to our facility.

2. Policy Principles

We define our objectives according to the actual impacts arising from our production profile, ensuring that they are achievable and measurable.

Climate Change and Greenhouse Gas Emissions

1. We prepare our corporate greenhouse gas inventory and update it at least once a year.
2. We establish our emission reduction targets at senior management level, record them in meeting minutes, and evaluate their progress during Management Review meetings. Our current targets are to reduce our indirect energy-related (Scope 2) emissions by 25% and our value-chain-related (Scope 3) emissions by 10–12% by 2027.
3. We aim to reduce fossil fuel-related emissions from our vehicle fleet by 10% by 2027. Accordingly, we prioritize hybrid and electric vehicles when renewing our fleet and promote vehicle sharing and route optimization practices.
4. We aim to reduce emissions arising from guest and consultant visits by 20% by 2026. To this end, we increase the use of online meetings and prefer low-carbon transportation for mandatory travel.
5. We seek to reduce logistics-related emissions by increasing vehicle utilization rates in our shipments.
6. In order to calculate our value chain emissions more accurately, we request carbon emission data from our suppliers and aim to gradually increase the proportion of suppliers sharing such data.
7. We assess the potential impacts of climate change on our activities and review our business processes accordingly.

Energy Management

1. We record our energy consumption monthly by source and production department and analyze the data at regular intervals.
2. In order to improve energy efficiency, we plan the installation of sensor-controlled lighting and automatic shutdown systems in administrative buildings, the wider use of energy-efficient office equipment, and insulation improvements to address heat losses.
3. We aim to obtain renewable energy certificates for a certain share of the electricity we purchase and record such purchases with official documentation.
4. We continue to evaluate renewable energy generation and procurement options in terms of their technical and economic feasibility.

Water Management and Wastewater

1. We calculate our water footprint and record our water consumption monthly by production department.
2. We identify consumption points and water-saving potential through water audits and gradually continue the transition to water-efficient fixtures and equipment.
3. Under our Water Efficiency Management Plan, we aim to increase the proportion of rainwater use to 10% by 2031, reduce our total water consumption by 8.2% by applying best available techniques, and increase the number of activities aimed at raising individual water-efficiency awareness to five per year.
4. To achieve these targets, we plan to install rainwater harvesting systems and invest in systems for the recovery of process effluent.
5. We manage our wastewater in compliance with the applicable discharge conditions, have the required analyses performed by accredited laboratories, and keep the results on record.

Pollution Control and Hazardous Substances

1. We adopt pollution prevention as a fundamental principle and seek to control our air, water, soil, and noise-related impacts at source.
2. We have our air emission, wastewater, and environmental noise measurements carried out by accredited laboratories at the intervals required by legislation and ensure that the results remain below the applicable legal limit values.
3. We ensure that the Safety Data Sheets (SDSs) for the chemicals we use are up to date and accessible, and we comply with the rules concerning the labeling, storage, and transportation of hazardous substances.
4. We monitor the status of our products with regard to Substances of Very High Concern (SVHCs) under REACH, keep our REACH declarations up to date, and share them with our customers upon request. We also assess the REACH compliance status of our suppliers.
5. We comply with the requirements concerning prohibited and restricted substances under KKDİK and customer specifications and, where possible, evaluate less hazardous alternatives.
6. We record every spill and leakage incident, even if it has not reached the environment. Ensuring that reporting is not discouraged is a fundamental principle.

7. We implement preventive measures in areas posing a risk of leakage and fulfill our obligations regarding the prevention of soil contamination.

Waste Management and Circular Economy

1. We follow the waste hierarchy. We prioritize waste prevention, reuse, and recovery, and consider disposal as the last option.
2. We segregate waste at source and collect hazardous and non-hazardous waste separately under the conditions prescribed by legislation.
3. We transfer waste only through licensed companies and via the notification and transportation systems required by legislation.
4. We maintain our Zero Waste Management System and ensure the validity of our Zero Waste certification.
5. We aim to increase the use of recycled content in our packaging materials and reach a rate of 15% by 2027.
6. We consider ensuring that our products have a long service life, enable easy maintenance and repair, and are suitable for recovery at the end of their useful life as part of our design approach.

Biodiversity and Ecosystems

1. We develop long-term solutions to protect biodiversity and reduce our impact on ecosystems.
2. As our facility is located within a free-zone plot designated for industrial use, our impact on ecosystems is predominantly indirect. Therefore, we consider reducing our emissions, wastewater, water consumption, and waste as the primary means of contributing to biodiversity.
3. When a new area of activity or a change in capacity is planned, we include proximity to protected areas and potential impacts on natural habitats in our assessment.

3. Roles and Responsibilities

Environmental management is the responsibility of the entire organization. Our managers are responsible for translating this policy into operational instructions applicable in the field, setting objectives, and communicating them to their teams.

General Manager and Senior Management: Approve the policy, provide the necessary resources for effective environmental management, establish environmental and energy objectives, and evaluate performance during Management Review meetings.

Quality Executive: Maintain and improve processes in accordance with ISO 14001, monitor legal permits, declarations, and periodic measurement obligations, follow up on internal and external audit findings, and manage document control and revision processes.

Production and Maintenance Departments: Record energy, water, and waste data at source, implement environmental measures in the field, and immediately report spills and leakages.

Occupational Safety Specialist and Occupational Physician: Manage processes intersecting with environmental aspects, such as chemical exposure, hazardous substance management, and emergency preparedness.

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Purchasing Department: Verify the validity of licenses of waste and chemical service providers and apply the criteria of the Sustainable Procurement Policy in supplier evaluations.

Human Resources Department: Include environmental and energy training in the Annual Training Plan and record training attendance.

All Employees: Use energy and water efficiently, properly segregate waste, report leaks and environmental nonconformities, and participate in mandatory environmental training.

Subcontractors and Suppliers: Comply with the requirements of this policy during activities carried out on site and provide the requested environmental data.

4. Awareness and Training

- We plan training on environmental, energy, and emissions management within the scope of the Annual Training Plan, record attendance, and monitor the completion rate.
- We identify training needs based on risk assessment results, regulatory changes, the current competency levels of our employees, and changes in processes.
- We conduct emergency drills as planned and record the improvements identified following each drill.
- We support information and awareness activities concerning electricity, water, and waste with visual materials at relevant points of use.

5. Monitoring and Reporting

We monitor, measure, analyze, and transparently report our environmental performance indicators. Our energy, water, and waste data are recorded monthly. The validity of our permits, licenses, and declaration obligations, as well as the results of periodic measurements, are checked at the intervals prescribed by legislation. The results are evaluated during Management Review meetings. Where deviations from targets are identified, corrective actions are initiated by assigning a responsible person and a deadline. We disclose our environmental performance as part of our sustainability reporting activities and use feedback obtained from internal and external audits for continuous improvement.

6. Effective Date and Revision

This policy enters into force upon approval by the General Manager. It is communicated to all employees, provided to employees upon commencement of employment, and displayed on notice boards. The policy is also shared with our subcontractors, suppliers, and business partners and is made available to other stakeholders upon request.

We review the policy and the progress toward the targets defined therein at least once a year. In the event of regulatory changes, changes in production processes or the scope of activities, a significant environmental incident, or audit findings, the policy is reviewed without waiting for the scheduled review period. Quality Executive is responsible for the review. Revisions are submitted for the General Manager's approval through the Quality Department.