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**SÖNMEZ TRAFÖ**

**SÖNMEZ TRANSFORMATÖR SAN. ve TİC. A.Ş.**

Makine İhtisas OSB 5. Cad. No:31 41435 Dilovası/KOCAELİ-TÜRKİYE Tel: 0 262 655 54 50 Faks: 0 262 655 57 52

[www.sonmeztrafo.com.tr](http://www.sonmeztrafo.com.tr)

# SUSTAINIBILTY REPORT

Prepared by : Güven YURT FR.SB.04	Approved by : Oluş SÖNMEZ <b>CONTROLLED DOCUMENT</b>
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10.1	General	<b>ÇY.EK-01</b>	Manual
10.2	Nonconformity and Corrective	<b>GN.PR-06</b>	Corrective action procedure
10.3	Continuous Improvement	<b>ÇY.EK-01</b>	Manual

### a) IMPLEMENTATION OF ENVIRONMENTAL MANAGEMENT SYSTEM

STS implements the ISO 14001:2015 environmental management system, ensures its sustainability and continuously improves it in order to increase environmental performance, fulfill compliance obligations and achieve environmental objectives.

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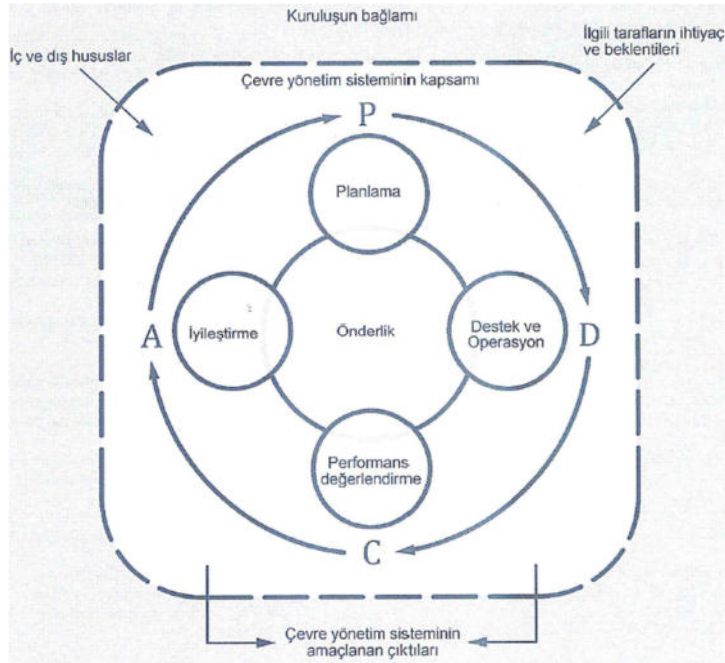
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### b) CONTINUOUS IMPROVEMENT MODEL

The basis of the approach that forms the basis of our environmental management system is the PDCA (Plan-Do-Check-Act) cycle. The PDCA model provides an iterative process used by the organization to achieve continuous improvement. PDCA can be briefly expressed as:

- Plan: Establishing the objectives and processes necessary to achieve results, in accordance with the organization's environmental policy.
- Do: Implement processes as planned
- Check: Monitoring and measuring processes and reporting results according to environmental policies, including commitments, environmental objectives and operating criteria.
- Action: Taking action for continuous improvement

The figure below shows how the framework provided in this standard can be integrated into a PDCA model (helping new or existing users understand the importance of the systems approach).



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c)

#### OUR MISSION

*To maintain our position in the transformers and reactors production sector by constantly developing and staying innovative with the help of our local capital.*

#### OUR VISION

*To stay and maintain being a sought-after and trusted brand in the production of special transformer and reactors within our design scope.*

*To guarantee production efficiency by using modern quality techniques for standard distribution and power transformers.*

#### OUR MANAGEMENT SYSTEM POLICY

*As STS we meet local and international customer needs for production and after sales services of special transformers and reactors related with distribution, transmission networks and for many more sectors and purposes. For this purpose;*

**Quality (ISO 9001)**

**Environment (ISO 14001)**

**Occupational Health&Safety (ISO 45001)**

*We are committed to our management system policy, we strictly follow all the related terms and continuously improve system performance.*

*We give maximum effort to protect the environment, to reduce usage of natural resources and to prevent environmental pollution.*

*We provide safe and healthy working conditions for the prevention of work related injury and/or ill health.*

*We consult our employees and get their opinions.*

*We eliminate hazards and reduce OH&S risks*

*We consider that ensuring the continuity of the trainings is an important contribution to raise society awareness.*

*We maintain customer satisfaction throughout the life of the project.*

*We ensure safe production of products and equipments, safe usage and safe delivery to customers.*

*We consider that sharing and disseminating Quality, Environment-OHS Management Systems with our suppliers, customers and subcontractors as social improvement.*

*We produce Innovative, Diversified and Reliable products.*

Date: 05/2020

Chairman of the board of directors

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### d) OUR ETHICAL VALUES

• Managers and employees must do their part to keep the reputation of the company and its shareholders at the highest level by considering these core values in all their relationships and work.

#### Activities

• -Company activities are carried out on the basis of current legislation, articles of association, internal regulations and established policies.

• -All employees support the internal audit work carried out to monitor the compliance of the company's activities with legal regulations and internal regulations, by cooperating.

#### Prevention of corruption and bribery

• Not to be involved in, and in no way tolerate, any case of corruption or bribery, including any payment or other gain to a public official to influence the decision-making process in breaking a law.

#### Respecting the basic human rights of employees

• -Provide equal opportunities and treat them equally, regardless of their colour, race, nationality, social status, disability, sexual orientation, political and religious beliefs, gender and age;

• -To respect the dignity, privacy and rights of each individual;

• -Not forcing the person to work against their will;

• -To oppose unacceptable behavior such as psychological violence, sexual harassment and discrimination against employees:

• Prohibit behavior involving sexuality, coercion, threats, insults or exploitation, including gestures, utterances and physical contact;

• -To provide workers with an appropriate wage and to ensure that the applicable national minimum wage is paid;

• -To comply with the maximum working hours accepted by the law;

• Recognize the right of employees to assemble freely as far as legally possible and not discriminate against members of employee organizations or trade unions;

#### Business Ethics and Behaviors

• -All employees carry out their duties in an egalitarian, transparent, accountable and responsible manner.

• -The company's resources and opportunities cannot be used to support political activities, political activities cannot be carried out within the company, donations cannot be made to political parties and political campaigns cannot be supported.

• -Political, social and religious views cannot be expressed and discussed in the working environment.

• -In principle, employees cannot work in a second job outside the company. However, employees are encouraged to fulfill their social responsibilities. For this purpose, by obtaining the approval of the Board of Directors, it is possible to take office in an association, foundation, profession or educational institution that provides public service.

• -Relationships cannot be established at all levels within the company, except for business relations, and it should be known that relatives cannot be employed within the company.

• -E-mails, records of customers and other transactions, files, documents, programs, data, customer lists, computer software, reports, technical information, materials provided by the company cannot be used outside of business. This information cannot be disclosed to third parties for any reason without the approval of the Board of Directors.

#### Prohibition of child labor

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- Not employing workers under the age of 15 or employing workers under the age of 14 in countries included in the developing country exception in the ILO (International Labor Organization) convention no. 138.

### **Health and Safety of Employees**

- -To comply with the occupational health and safety responsibilities of its employees in the workplaces;
- -Containing hazards and taking the best possible precautions against accidents and workplace-related illnesses;
- -Providing training opportunities and ensuring that their employees are trained on occupational health and safety measures;
- - Establishing or using an occupational health and safety management system in accordance with ISO 45001 or equivalent standards.


### **Environmental Protection**

- -To act in accordance with applicable mandatory and international standards regarding environmental protection;
- -To minimize the pollution of the environment and to provide continuous developments for the protection of the environment;
- - Establishing or using an environmental management system that complies with ISO 14001 or equivalent standards.

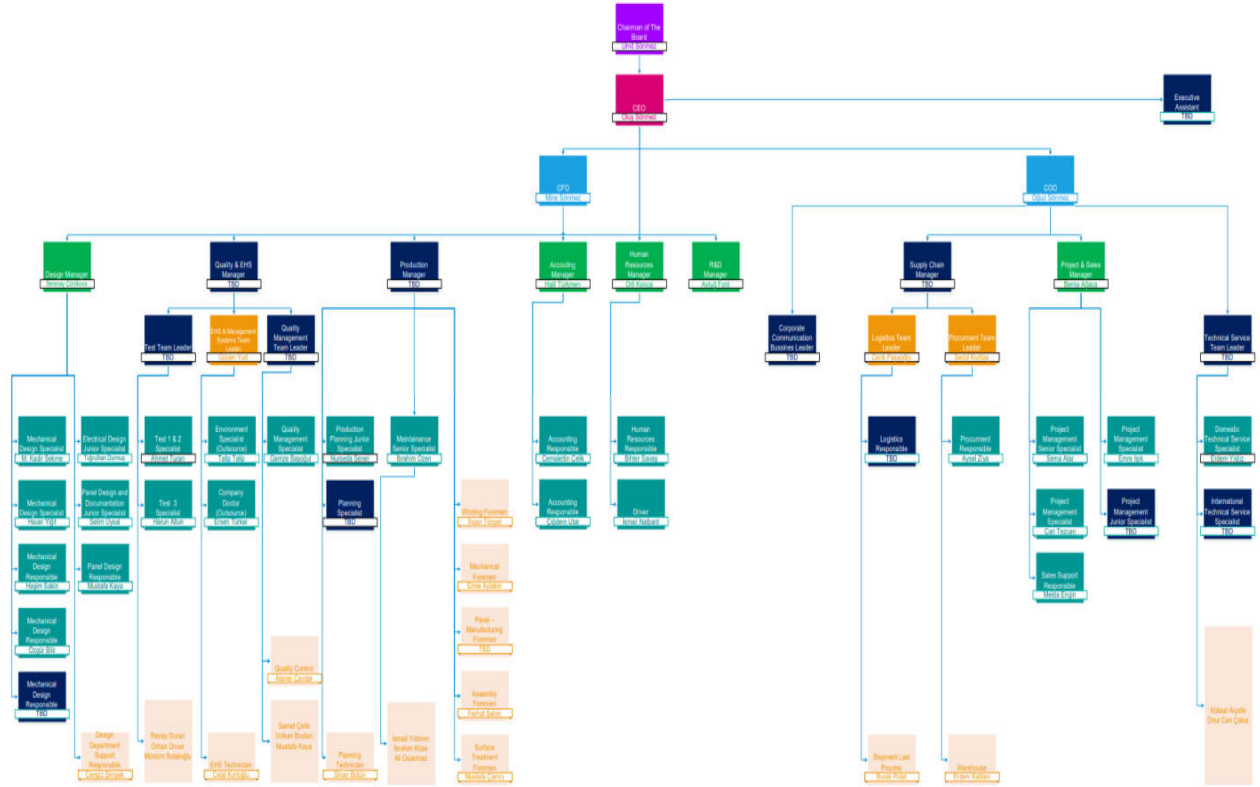
### **Supply chain**

- -To strive to ensure that Suppliers comply with this Code of Ethics;
- -To comply with the principle of non-discrimination in the selection of suppliers and the attitude towards suppliers.

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**e) COMPANY ORGANIZATION CHART**



The management representative is the Quality Management Officer.

**4 CONTEXT OF THE ORGANIZATION**

**4.1 UNDERSTANDING THE ORGANIZATION AND ITS CONTEXT**

Sönmez Trafo A.Ş. has identified internal and external issues that are relevant to its purpose and affect its ability to achieve the intended outputs of environmental management systems. It covers potential situations affected by and affecting STS.

**4.2 UNDERSTANDING THE NEEDS AND EXPECTATIONS OF RELATED PARTIES**

The parties concerned with the environmental management system and the expectations of the relevant parties and the compliance obligations arising from these needs and expectations have been determined.

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The parties concerned	considerations	Internal and external	Positive Expectations	Negative Expectations
Employees	Human Resources	Internal	good salary Career planning	Salary below market average Constant employee change
	Hazardous / non-hazardous wastes		Suitable areas for waste Proper disposal of waste	Inappropriate waste areas Failure to dispose of waste
	working environment		Environment suitable for the operation of processes	Environment unsuitable for the operation of processes
	pandemic diseases		<i>Taking all precautions against the epidemic</i>	<i>Inadequate epidemic measures</i>
	PPE and collective protection equipment		Providing appropriate PPE and taking collective protection measures	Failure to provide appropriate PPE and fail to take collective protection measures
			Providing the necessary infrastructure for OHS legislation	Insufficient infrastructure for OHS legislation
			Having a good safety culture	Poor occupational safety culture
			Developing employee engagement and consultation processes	Inadequate employee engagement and consultation processes
	safety culture		OHS performance is higher than other organizations Participation in OHS activities (seminar, training, forum, etc.)	Poor OHS performance compared to other organizations Lack of interest in OHS activities
	Working times		Sensitivity to OHS in designs Reasonable and satisfactory working times	Indifference to OHS in designs Working hours lead to dissatisfaction
	Accidents at work		Taking precautions against work accidents	Inadequate measures against occupational accidents
	work equipment		Provision of technological equipment suitable for OHS	Failure to provide equipment suitable for OHS
Employer		Internal	right leadership Correct strategic planning	Lack of leadership Incorrect strategic planning
	Resources and Leadership		Business continuity High customer satisfaction High customer loyalty High employee loyalty	Poor crisis management Low customer satisfaction low customer loyalty Low employee loyalty
			Correct resource management	Uncontrolled resource consumption
	<i>environmental management</i>		<i>Compliance with environmental legislation</i>	<i>Exposure to environmental punishment, damage to reputation</i>
	pandemic diseases		<i>Employees' compliance with epidemic measures in the company and in the</i>	<i>Failure of employees to comply with epidemic measures</i>
			<i>Compliance with OHS legislation</i>	<i>Exposure to OHS penalty</i>
			<i>No work accident or occupational disease</i>	<i>Work-related injury and ill health, damage to reputation</i>
	<i>Job health security</i>		<i>Use of new technology</i>	<i>lagging behind in technology</i>
			<i>Continuous improvement in processes</i>	<i>Failure to improve</i>
			<i>High awareness of the employees, compliance with the rules.</i>	<i>Employees being unconscious, non-compliance with rules</i>
visitors	Our OHS rules	Internal and external	Informing about OHS rules	Failure to inform about OHS rules and failure of the visitor to comply with the rules
	pandemic diseases		<i>Taking epidemic measures</i>	<i>Failure to take epidemic measures</i>
employer union	employer rights	external	Compliance with contract terms Cooperation between employer and labor union	Non-compliance with contract terms Failure to agree on the terms of the contract
			Education and information services	Lack of education and information services
labor union	worker rights	external	Compliance with contract terms	Non-compliance with contract terms
			Cooperation between employer and labor union	Failure to agree on the terms of the contract

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The parties concerned	considerations	Internal and external	Positive Expectations	Negative Expectations
Official institutions (Ministry, municipality, etc.)	Compliance with legal requirements	external	Compliance with legal requirements	Penalties for non-compliance with legal requirements
	Legal permits, licenses		Timely payment of taxes	Loss of company prestige
			Have permits and licenses	Penalties as a result of permission and unlicensed work
OSB management	OSB regulation	external	Compliance with OSB regulation	Difficulties in compliance
	OSB rules service quality		Providing quality service to companies	Decreased OSB service quality
Insurance Companies	Covering the damages of the company and its	external	Taking the measures requested by the insurance companies	Being victimized by a negativity
			Timely payment of premiums	Late premium payments
			Correct determination of insurance coverage	Incorrect determination of insurance coverage
OSGB	Occupational physician service	external	Fulfilling the duties specified in the legislation	Failure to perform specified duties
			Providing the infrastructure to provide quality service	Lack of necessary infrastructure
Environmental Consulting firm	Environmental Officer service	external	Fulfilling the duties specified in the legislation	Failure to perform specified duties
			Providing the infrastructure to provide quality service	Lack of necessary infrastructure
Neighboring companies	emergencies	external	Cooperation and coordination in emergencies	Lack of cooperation and coordination in emergency situations
			Neighbors should be prepared before, during and after emergencies.	Not being prepared for before, during and after emergencies
			Knowing the effects of emergencies that may occur in neighbors on our company	Being unprepared for the effects of emergencies that may occur in neighbors to our company
customers			long-term studies	The customer does not know what they want
			trust	Insecurity
			timely payment	late payment
	Business and Income	external	Well priced contracts	Sales at a loss
			Creating a good reference	Bad reference creation
			timely delivery	late delivery
environmental management		Compliance with environmental legislation	Loss of prestige, exposure to environmental punishment	
pandemic diseases		Compliance with epidemic measures	Failure to comply with epidemic measures	
Job health security		Compliance with OHS legislation	Loss of prestige, exposure to OHS penalty	
		Work accident-free	Occurrence of work accidents	
suppliers	Material, equipment, service	external	long term agreements	no alternative
			trust	Insecurity
			timely payment	late payment
			Well priced contracts	High priced contracts
			timely delivery	late delivery
Subcontractors	Cooking, security, gardening, pest control, personnel service and cleaning	Internal and external	long term agreements	Not following the business plan
			trust	Bad reference generation
			timely payment	Loss of trust and prestige
			Protecting the company's prestige	Failure to meet proficiency
	Environment and OHS		timely service	Failure to provide timely service
		Compliance with environmental and OHS legislation	Failure to comply with environmental and OHS legislation	
3rd party audit firms	Audit and certification services	external	Sustainability of certificates	Revocation of certificates
			Quality and developing, beneficial service	Service that does not add value
Company location	geolocation	external	No need for a treatment plant	Treatment plant not working properly
	climate change		Compliance with environmental legislation	water shortage
				Increasing air pollution/temperature
All interested parties	Changes in internal matters	Internal	Making a risk assessment by evaluating the changes	Ignoring/not evaluating changes
	Changes in external matters	external		

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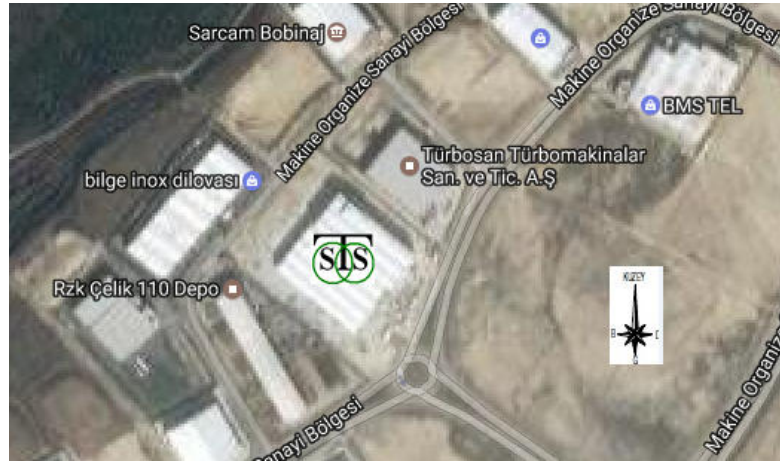
### 4.3 DETERMINING THE SCOPE OF THE ENVIRONMENTAL MANAGEMENT SYSTEM

The founder of our company, Elk. Load. Eng. Süreyya SÖNMEZ has realized the most robust, durable and economical transformer design by evaluating the knowledge and experience she gained by working in calculation-construction, manufacturing, test-quality control units for many years in the transformer factories of companies that produce with French, German, British and American licenses and created a license for our company. .

150MVA/MVAR provides design, production and after-sales services and maintenance-repair of distribution, power, rail system and special transformers and reactors up to 220kV. STS works mainly on exports and provides 75-90% of its turnover from foreign companies.

SONMEZ TRANSFORMER IND. VE TİC. Inc. Our company was established in Kartal on August 1, 1975 and transferred to Gebze in 1981. While it was a two-partnered collective company in its establishment, it gained the status of a joint stock company at the beginning of 1985. It continued its production in these facilities with an area of 7500 m2 until July 1998.

In 2017, "Machinery Specialization OSB 5. Cad. with an area of 40000 m2. No:31 41435 Dilovası/KOCAELİ" moved to its new facilities.



The administrative and production units of our company are at the same address. It is defined as the Machinery Specialization Organized Industrial Zone.

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Located in the northeast of our company, TÜRBOSAN A.Ş. produces agricultural irrigation, drinking water, wastewater and similar pumps. It prioritizes energy efficiency within the scope of production.

In the West, Bilge İNOKS A.Ş. has a firm. It designs and manufactures stainless steel kitchenware and industrial products.

RZK CELIK SAN. VE TİC A.Ş. The company has a steel material warehouse.

STS has determined the internal and external issues related to its purpose and strategic direction and to achieve the intended outputs of the environmental management systems, and has determined the needs and expectations of the relevant parties.

Legal requirements are fulfilled by creating processes, procedures, instructions and related documents for the implementation of EMS, ensures the separation of wastes at the source, disposes of hazardous wastes through licensed companies, environmental measurements (noise, emission, chemical, dust, water analysis, etc.) through accredited institutions. does it with.

Environmental legislation is followed by the Management Representative from the official gazette and social media. The up-to-dateness of the information is monitored, and in case of change, the changing legislation ensures that action is taken by reviewing it within the scope of the evaluation of compliance.

STS evaluates the total impact of its production and use activities on the environment throughout the "life cycle" of the product, that is, from the design stage to the procurement of raw materials, production and the end of its useful life, until the final wastes return to nature.

STS has determined the internal and external issues related to its purpose and strategic direction and to achieve the intended outputs of the environmental management systems, and has determined the needs and expectations of the relevant parties.

Our environmental management system scope is shared with the relevant parties. This scope is on our environmental management system document and is updated on our website.

#### 4.4 ENVIRONMENTAL MANAGEMENT SYSTEM

With the establishment of the environmental management system, methods were determined in a way that would not harm the environment, protect it and increase its environmental performance in relation to all products, activities, services and emergencies of our factory, targets were determined and processes were established to ensure their implementation in all areas, procedures, instructions, action plans. and source documents.

STS considers the internal and external issues and the needs and expectations of the relevant parties to establish and maintain the environmental management system.

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### 5. LEADERSHIP

#### 5.1 LEADERSHIP AND COMMITMENT

Top management demonstrates leadership and commitment to the environmental management system through:

- a-) Accountability for the effectiveness of the environmental management system,
- b-) Ensuring that environmental policy and environmental objectives are established and that they are compatible with the strategic direction and context of the organization,
- c-) Ensuring that environmental management system requirements are integrated with the organization's business processes,
- d-) Ensuring the existence of the necessary resources for the environmental management system,
- e-) Sharing the importance of effective environmental management and compliance with environmental management system requirements,
- f-) Ensuring that the environmental management system achieves its intended outputs,
- g-) Management and support of personnel who will contribute to the effectiveness of the environmental management system,
- h-) Encouraging continuous improvement,
- i-) Supporting other relevant management tasks (as applied to their area of responsibility) to demonstrate leadership.


#### 5.2 ENVIRONMENTAL POLICY

Sönmez Trafo A.Ş.'s senior management has defined the environmental management system policy together with other management systems, and it is implemented and its continuity is ensured.

This policy;

- a) conform to the nature, scale and environmental impacts of our organization's activities, products and services,
- b) includes our organization's commitments to continuous improvement and pollution prevention,
- c) includes a commitment that our organization will comply with the current environmental legislation and administrative regulations and other conditions to which it is automatically subject,
- d) serve as a framework for setting and reviewing environmental goals and objectives;
- e) documented, implemented and maintained and communicated to all employees,
- f) has been kept open for inspection by interested parties,
- g) It includes a commitment to continuous improvement of the environmental management system.

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Sonmez Transformer Inc. Management Systems Policy, prepared by the company, is explained in section c) and published on the company's website.

### 5.3 CORPORATE MISSION, AUTHORITIES AND RESPONSIBILITIES

Environmental duties, authorities and responsibilities are defined in the mission instructions. Our organizational chart is given in section e).

Sonmez Transformer Inc. Top management, regardless of other responsibilities:

a) Ensuring the establishment, implementation and maintenance of the required Environmental Management System in accordance with this standard;

b) To report the performance and success level of the system to the senior management in order to form the basis for the review of the Environmental Management System;

has appointed a management representative who has the duties, responsibilities and authorities determined for the purpose. Among other responsibilities, it has duties and powers that include;

- To ensure that the environmental policy is known at all levels,
- To follow the environmental targets,
- Establishing and maintaining the processes required for the EMS,
- To report at the YGG meeting on issues related to the performance and improvement of the EMS
- Collecting data, evaluating, producing and applying solutions in order to improve EMS performance.

An HSE Committee has been established in our company in order to carry out Environmental Management System activities. In this regard, "HSE Committee Duties and Organization Procedure" (SEÇ.PR-04) has been created and implemented.

The HSE Committee convenes extraordinarily every 2 months and when necessary, upon the request of the Management Representative and/or the General Manager.

## 6 PLANNING


### 6.1 RISK AND OPPORTUNITY IDENTIFICATION ACTIVITIES

#### 6.1.1 GENERAL

Risks and opportunities are evaluated for each process according to our organizational context, needs/expectations of interested parties and scope of environmental management system.

Continuous improvement, to comply with the objectives of the environmental management system and to prevent or reduce undesirable effects, including external environmental conditions; risks and

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opportunities are determined regarding the context of our company and the expectations of interested parties, environmental aspects, compliance obligations and conditions (ÇY.PR-01).

The identified risks and opportunities provide input for planning and activities and setting environmental objectives.

### 6.1.2 PERIPHERAL DIMENSIONS

Sönmez Trafo A.Ş. has determined the environmental dimensions of its activities, products and services that can be controlled or affected by it in order to identify those that have significant impacts on the environment. For the continuation of this practice, the "Procedure for Determination of Environmental Aspects and Effects" (ÇY.PR-01) has been created and implemented. Environmental Aspects and Impacts Checklist (ÇY.KD-06) has been prepared and published.

Sönmez Trafo A.Ş. has ensured that the environmental dimensions related to these important impacts are related to the environmental objectives, by considering the environmental dimensions while determining the environmental objectives.

The processes of determining the environmental dimensions and effects occurring in our company, making the risk scoring and determining the important effects on the environment are carried out by the HSE Committee. Information about the scoring system is specified in the procedure.

In our company, environmental dimensions and effects are constantly monitored and a method has been created in which all personnel will participate. Accordingly, the addition, removal and modification of new environmental dimensions are followed up to date.

### 6.1.3 COMPLIANCE OBLIGATIONS

Sönmez Trafo A.Ş., which can be applied to its activities, products and services; It has determined the legal conditions and the conditions and requirements that it has accepted to comply spontaneously and voluntarily, although it does not arise from the law, by evaluating the environmental dimensions. In order to ensure these, the "Statutory and Other Conditions Procedure" (SEÇ.PR-01) has been created and implemented.

The HSE Legislation List (SEÇ.KD-01) that we are obliged to comply with has been published by the Management Representative. This list contains environmental laws, regulations, by-laws, etc. that should be followed. and the official gazette is kept up-to-date via the internet.


Customer conditions are; It is provided by the Sales and submitted to the Design with the Internal Order form, included in the system and compliance is ensured.

Evaluation of the degree of compliance with the compliance obligations regarding legal requirements is made with the environmental officer monthly reports and annual internal audit report.

Changes in legal conditions are discussed at HSE Committee meetings, and if necessary, changes are made in the Environmental dimension and effects checklist.

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#### **6.1.4 PLANNING ACTIVITY**

Significant environmental aspects, risks and opportunities, and compliance obligations activities are monitored by the Management Representative with the Select Monitoring and Measurement Plan (SEÇ.KD-02) and HSE Legislation list.

While making action plans, technological options and other financial, operational and business conditions are also evaluated.

### **6.2 ENVIRONMENTAL OBJECTIVES AND PLANNING TO ACHIEVE THEM**

#### **6.2.1 ENVIRONMENTAL OBJECTIVES**

Sönmez Trafo A.Ş. determines its objectives in a way that is consistent with its environmental policy, measurable if possible, and while creating, reviewing and updating the programs, legal conditions and other conditions and requirements; its important environmental aspects, its choice in technology; It takes into account the financial situation and operating conditions, the business situation and the views of the relevant parties. Our company announces our environmental objectives to our employees by using the environmental board. Our company uses the "Purpose-Targets and Management Programs Procedure" (GN.PR-09) while determining environmental objectives and management programs.

#### **6.2.2 PLANNING ACTIVITIES TO ACHIEVE ENVIRONMENTAL OBJECTIVES**


Sönmez Trafo A.Ş. has determined environmental targets and created management programs for each task and level within its body, published the "Purpose-Targets and Management Programs Procedure" (GN.PR-09) and documented them and maintained its continuity with periodic reviews. provided.

In the environmental program;

- HSE objectives to be achieved through the program,
- Identification of the program and those responsible for its implementation,
- Resources,
- Timing of steps (deadline – completion date),

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determined.

The results of the environmental objectives planning are discussed at the management review meeting, and their follow-up is ensured.

## **7 SUPPORT**

### **7.1 RESOURCES**

The resources needed for the establishment, implementation, maintenance and continuous improvement of the environmental management system have been determined.

### **7.2 QUALIFICATION**

Competencies related to the environmental management system and the required trainings are determined in the job instructions.

Their qualifications are guaranteed by taking into account their appropriate education, training and experience.

Environmental aspects and training needs related to the environmental management system were determined.

### **7.3 AWARENESS**

Sonmez Transformer Inc. training needs are identified and individuals whose duties may have a significant impact on the environment are given appropriate training.

Sonmez Transformer Inc. Employees, at all levels and in all types of assignments:

- a) Complying with the environmental policies and procedures and the requirements of the EMS,
- b) Importance of actual or potential environmental impacts, benefits to the environment from the development of personal actions and achievements, with activities related to their business,
- c) Duties and responsibilities in ensuring compliance with environmental policies and procedures – including being prepared for emergencies and implementing necessary actions –
- d) Possible consequences of deviating from certain procedures followed in transactions

"Training Procedure" (GN.PR-04) has been created and implemented in order to help people understand the importance of such issues and raise awareness on this issue.

training needs;

- To ensure the continuity of the environmental management system,
- To keep environmental awareness alive,
- new machines and methods,

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- nonconformities, corrective-preventive actions,
- environmental audits,
- emergencies,
- internal and external complaints,
- Recruitment of new personnel,
- changes in laws and regulations for which we are responsible, etc. emerges.

The trainings, which are defined as a legal requirement at least once a year, are planned and given together with the environmental officer. In addition, trainings are planned and provided by the management representative in order to convey the system conditions other than the legal requirements to the employees and to raise awareness.

Persons performing tasks that can have significant impacts on the environment have appropriate education and training and/or the necessary experience and qualifications.

### 7.4 CONTACT

Sönmez Trafo A.Ş., in terms of environmental aspects and EMS;

- Ensuring communication between various levels and units performing various tasks,
- Receiving, recording and responding to appropriate documents from interested parties outside the organization,


All kinds of communication tools and equipment have been provided for the purpose of communication, and the Communication Procedure (GN.PR-08) has been established and implemented in order to determine the method and maintain continuity.

In internal communications in our company; intercoms, mobile phones and notice boards are used.

In external communications; fixed and mobile telephone, fax and electronic media are used. Environmental issues from outside are conveyed to the Environmental Management Representative.

Information about our company's Environmental Management System can be given to 3rd party auditor companies, public institutions and organizations, and to our customers, if requested, by the Management Representative with the approval of the General Manager.

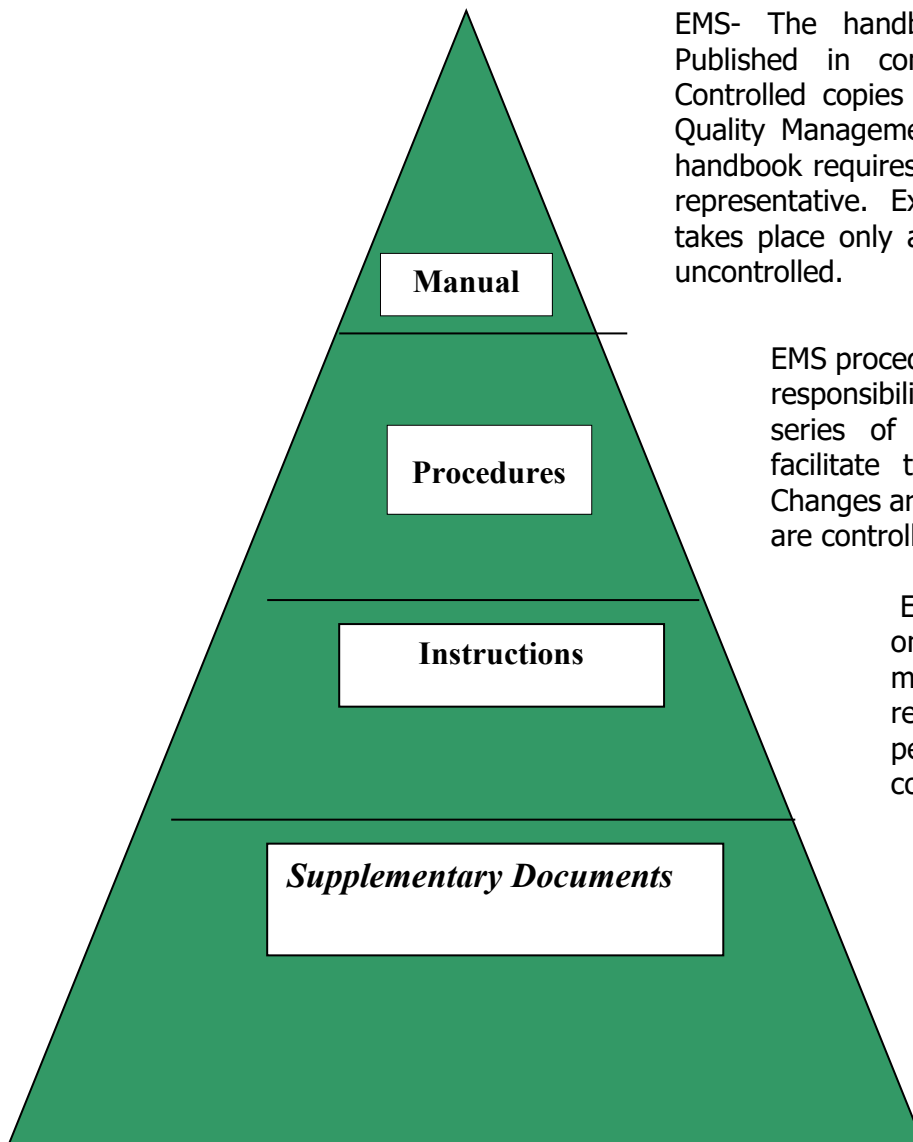
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## 7.5 DOCUMENTED INFORMATION

### 7.5.1 GENERAL

In order to increase the efficiency of the environmental management system, the management of the documented information required in the standard has been provided. The environmental management system documentation structure is as follows:



EMS- The handbook contains the basic system. Published in controlled and uncontrolled copies. Controlled copies are subject to modification by the Quality Management Department. Distribution of the handbook requires the permission of the management representative. External distribution of the manual takes place only at the request of the customer and uncontrolled.


EMS procedures, as they indicate a method and responsibility by themselves, often gather a series of instructions under one title and facilitate the understanding of the system. Changes are subject to permission. Distributions are controlled.

EMS instructions are grouped under one procedure. Each describes a method and identifies those responsible. Changes are subject to permission. Their distribution is controlled.

Supplementary documents include procedures and instructions, supporting, explanatory and often binding lists, programs, records, and booklets. Some of these are distributed in a controlled manner, and some are distributed uncontrolled.

The responsibility and authority of change, distribution and control of all documents included in the environmental management system belong to the environmental management representative.

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### 7.5.2 CREATE AND UPDATE

Sönmez Trafo A.Ş., all documents required by the TS ISO standard:

- a) Determination of their places,
- b) They should be reviewed within certain periods, if necessary, this process should be carried out appropriately or their qualifications should be approved by authorized personnel,
- c) Keeping the most recent copies in all neighborhoods where processes deemed important for the effective operation of the environmental management system are carried out,
- d) Collecting outdated copies immediately from the places where they were sent and used, or preventing unwanted uses,
- e) Proper identification of invalid copies retained for legal reasons or for the purpose of storing information,

"Document Control Procedure" (GN.PR-01) has been established and implemented in order to ensure There is a coding system as defined in the procedure to identify documents.

The distribution, revision and follow-up of the controlled documents are done by the Management Representative using the Quality Management Software. "CONTROLLED DOCUMENT" stamp is printed on manually distributed controlled documents.

Documents are reviewed annually by the Management Representative. In addition, revisions are made in process or legal legislation changes and upon the request of the personnel.

### 7.5.3 CONTROL OF DOCUMENTED INFORMATION

Sönmez Trafo A.Ş. published the necessary procedure and supplementary document for the determination, maintenance and management of environmental records, the method was determined and continuity was ensured.

"Document Control Procedure" (GN.PR-01) and "Record Control Procedure" (GN.PR-02) have been published in order to control the keeping of records related to the Environmental Management system.

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### 8.0 OPERATION

#### 8.1 OPERATIONAL PLANNING AND CONTROL

Sönmez Trafo A.Ş. has determined the processes and activities related to important environmental aspects, which have been determined in accordance with the policy objectives and targets, in line with the life cycle perspective. Sönmez Trafo A.Ş. undertakes these activities, including maintenance and maintenance operations, to ensure that they are carried out under certain conditions;

a) Establishment and maintenance of documented procedures, the absence of which may lead to deviations from environmental policies and objectives,

b) Ensuring compliance with transaction control criteria,

c) Notifying suppliers and subcontractors of procedures related to the significant environmental aspects of goods and services used by the organization,

planned way.

Process Control related "Control Procedure for Persons Entering and Exiting the Company" (SEÇ.PR-06) and "Waste Management Procedure" (ÇY.PR-08) have been established and implemented.

Recommendations and suggestions are made to raise environmental awareness among suppliers and subcontractors. Environmental training is provided to subcontractors if necessary. Contracts with subcontractors are made by the General Manager.


Solid wastes are divided into two as industrial and domestic. Hazardous wastes are collected in the hazardous waste area, and recyclable wastes are collected in their respective sections. Evaluable waste sales are carried out by the General Manager. Hazardous wastes are disposed of in accordance with the "Hazardous Waste Collection and Disposal Instruction" (ÇY.ÇT-01).

Since industrial wastewater is not given to the receiving environment in our company, it is not necessary to obtain a discharge permit according to the Water Pollution Regulation.

Our company has established the operation control, including the relevant parties and risk analyzes in the establishment of the environmental management system, by considering the life cycle from raw materials to the final product, to the end of its useful life.

While establishing the operational control infrastructure; The purchasing process during the selection of all other substances, especially the chemical substance at the input stage, the maintenance-repair process during the period of use in our factory site, the waste management process, the subcontractor and supplier

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management process, the natural resource management process, and at the end of life; waste management process comes into play.

## 8.2 EMERGENCY READY AND RESPONSE

Sönmez Trafo A.Ş. has determined methods to determine the probability of exposure to accidents and emergencies and to prevent or mitigate the environmental effects that may arise in such cases, and has published procedures (SEÇ.PR-07), instructions and auxiliary documents to ensure the continuity of these methods. Necessary training is also provided to ensure that these are learned and understood by all personnel.

An Emergency Action Plan has been created in our company and the task of an authorized Civil Defense Supervisor has been defined.

Sönmez Trafo A.Ş., after any accident or emergency, the methods related to emergency preparation and the works to be done in such cases are reviewed and rearranged when necessary. If a deficiency is felt, revisions are made or new instructions are written under the responsibility of the Management Representative.

Sonmez Transformer Inc. As far as possible, drills are held at appropriate intervals to understand and apply the methods. These exercises are documented with minutes and pictures.

## 9 PERFORMANCE EVALUATION


### 9.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION

Sönmez Trafo A.Ş. has published and implemented the "Monitoring and Measurement Procedure" (SEÇ.PR-08) in order to monitor and measure the characteristics of activities that may have significant impacts and to regularly review their compliance with the current environmental legislation. A "Monitoring and Measurement Plan" (SEÇ.KD-02) is created by the management representative in order to ensure periodic control and its follow-up is ensured.

A control method and control period are determined for the parameters to be controlled. Relevant laws and regulations are taken into account in determining the methods and periods. Institutions authorized to prepare reports are preferred for measurement and analysis processes, all of which will be done outside the company.

In order to ensure compliance with legal and other requirements, analyzes and tests are carried out according to the Monitoring and Measurement procedure (SEÇ.PR-08). In addition, the changes in the

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legal conditions are followed up in accordance with the Legal and Other Conditions procedure (SEÇ.PR-01), and compliance is evaluated under the control of the Management representative.

## 9.2 INTERNAL AUDIT

Sonmez Transformer Inc. It prepares an annual internal audit program for the EMS audits that should be carried out at appropriate intervals in order to determine whether the planned regulations, including the requirements of the standard, are complied with and whether they are properly implemented and maintained, and to inform the management about the results to be obtained. The preparation of this program and its auxiliary documents has been documented with the "Internal Audit Procedure" (GN.PR-05).

## 9.3 MANAGEMENT REVIEW

Management Review procedure (GN.PR-03) has been established and implemented.

The senior management of Sönmez Trafo A.Ş. periodically reviews the Environmental Management System, ensuring its suitability, adequacy and continuity. In order for the evaluation to be done well, the documents, documents and records that will be handled during the management's review within the system documents are specified in the procedures and instructions.

The management review process also considers, examines and decides on any necessary changes to policy, objectives and other elements of the system, taking into account audit results, changing circumstances and a commitment to continuous improvement.

The management review meeting is held at least once a year in January. All managers and the Civil Defense Supervisor attend the management review meeting under the chairmanship of the General Manager.

## 9 IMPROVEMENT

### 10.1 GENERAL

While carrying out activities for environmental improvement; The results of analysis and evaluation of environmental performance, internal audit and management review activities are evaluated.

### 10.2 NON-CONFORMITY AND CORRECTIVE ACTION

Sönmez Trafo A.Ş. has published a Corrective Action Procedure (GN.PR-06), which determines and maintains the methods for determining the responsibilities and authorities for tracking and examining nonconformities, taking action to mitigate harmful effects with these nonconformities, initiating and

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finalizing corrective actions, and is implemented. The opening and finalization of corrective actions are done electronically using the Quality Management Software.

The main sources of information that can be used to identify corrective actions are:

- Environmental system nonconformities encountered due to purchased products
- Customer complaints
- Environmental internal audits
- Environmental Management System Operational Nonconformities
- Machine, Process and Legislation changes
- Staff Suggestions and Meetings
- Environmental effects after emergencies

### 10.3 CONTINUOUS IMPROVEMENT

Continually improving the suitability, adequacy and effectiveness of the environmental management system to improve environmental performance.

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