

Responsible Artificial Intelligence Program Statement

1. Purpose and Scope

Zorlu Enerji uses artificial intelligence (AI) technologies across power generation, grid management, customer services, corporate support functions and sustainability applications to improve efficiency, strengthen the quality of decision-making and accelerate the low-carbon energy transition. This statement has been prepared to explain to the public, investors, customers, employees and business partners, how the principles set out in our Responsible Artificial Intelligence Policy are translated into practice.

The statement covers Zorlu Enerji Elektrik Üretim A.Ş. and its consolidated subsidiaries, and applies to AI solutions developed in-house, third-party AI products and services we procure, and AI systems operated on our behalf by third parties.

2. Governance and Accountability

Responsible AI governance is the responsibility of our Technology and Artificial Intelligence General Directorate. This function is accountable for implementing the AI policy, maintaining the AI inventory, classifying risks and approving use cases. Ethical, data privacy, information security, legal compliance and sustainability dimensions are assessed jointly with the participation of the relevant corporate functions.

The Responsible Artificial Intelligence Policy has been endorsed by the Company's highest approval authority. Material AI-related risks are escalated to executive management and the Board of Directors through our enterprise risk management framework and the Early Detection of Risk Committee. Every AI system has an accountable business owner throughout its lifecycle; accountability is never delegated to an algorithm.

3. Limiting Access to Sensitive AI Capabilities

We neither deploy nor develop AI applications that pose unacceptable risk to fundamental rights and freedoms. Accordingly, the creation of facial recognition databases through untargeted scraping of images, emotion recognition in the workplace, sensitive categorisation based on biometric data, social scoring and use for mass surveillance are prohibited. Our approach is aligned with the list of prohibited practices under the EU Artificial Intelligence Act.

Access to sensitive AI capabilities and to training and inference data is restricted through data classification, role-based authorisation, need-to-know provisioning and logging controls. Use cases classified as high-risk undergo a separate assessment and approval process before deployment.

4. Distinct Labelling of AI-Generated Content and AI-Driven Decisions

Transparency is a core principle of our responsible AI approach. Users and affected parties are clearly informed when they are interacting with an AI system or when output has been produced with AI support. To that end:

- Conversational assistants interacting with customers and employees visibly disclose that the service is provided by artificial intelligence.
- Synthetic content generated with AI (text, image, audio) is labelled in a distinguishable manner.
- Software code produced with AI assistance is flagged with a distinct marker in version control records.
- Where a decision affects individuals, the person concerned is informed that AI supported the decision and is provided with the essential reasoning in plain language.

5. Detecting and Correcting Model Drift and Degradation

Deployed AI models are not managed through a one-off approval but are monitored throughout their lifecycle. Data and model drift, loss of accuracy and unexpected output behavior are tracked regularly against defined performance thresholds and monitoring dashboards.

Where thresholds are breached, corrective actions are applied, including model retraining, recalibration, increased human oversight or temporary suspension of the system. Adverse model-related situations are recorded as AI incidents within our corporate incident management process, subjected to root cause analysis, and the lessons learned are reflected in subsequent model development.

6. Regular Fairness and Bias Assessments

Preventing discrimination in AI systems that affect individuals is fundamental. During development, models are analysed for the representativeness of training data and for bias risk; once deployed, performance differences across subgroups are tested on a regular basis.

Assessments rely on more than one fairness metric applied together, and the results are reported to the system owner and the relevant governance functions. Where a material performance gap is identified, corrective action is taken until the gap is remedied. High-risk systems are subject to a separate impact assessment addressing effects on fundamental rights and freedoms.

7. Lowering the Ecological Footprint of AI Data Centres and Models

As an energy company, we consider managing the environmental impact of the technology we use to be part of our responsibility. In designing AI solutions, we favour the smallest and most efficient model fit for purpose, avoid unnecessary model calls, and apply caching and efficient architectural choices.

- Energy consumption arising from model training and inference is monitored, and consumption and emissions data are requested from our cloud service providers.
- Energy efficiency and carbon intensity are considered when selecting the region and data centre where workloads are run.
- Lower-consumption architecture and model alternatives are evaluated periodically as part of cost and resource optimisation (FinOps) activities.
- Suppliers' use of renewable energy and data centre efficiency performance are considered in supplier selection and assessment processes.

The carbon footprint arising from our use of AI is calculated in connection with our corporate greenhouse gas inventory work and addressed within our sustainability reporting.

8. Appeals and Human Review of AI Decisions

Decisions producing legal or similarly significant effects on individuals are not taken solely based on automated processing; qualified human oversight is mandatory. Customers, employees and affected third parties have the right to contest an AI-supported decision or outcome, to request an explanation of the reasoning behind it, and to request human review of the decision.

Appeals are received through our existing customer relations, ethics line, personal data request and incident management channels; they are resolved within the periods prescribed by applicable legislation and are formally recorded. Appeal outcomes are treated as feedback for improving the systems concerned.

9. Quantifying the Impact of AI on Sustainability Outcomes

We assess our AI initiatives not only in terms of financial and operational benefit but also against sustainability outcomes. Our investment evaluation processes consider how AI projects relate to our sustainability targets, and the operational and environmental effects of applications such as generation optimisation, predictive maintenance, grid efficiency and energy management are measured.

The Company is developing a methodology to consistently quantify the net impact of AI applications on sustainability outcomes, considering the footprint arising from AI use together with the savings and avoided impacts they enable. Once the methodology is finalised, the resulting figures will be disclosed within our sustainability reporting.

10. Employee Training on the Ethical and Secure Use of AI

People are the most decisive factor in the responsible use of AI. Our employees are therefore offered a training programme differentiated according to their roles and responsibilities:

- All employees: AI awareness, acceptable use rules, and the fundamentals of data privacy and information security.
- Employees use approved AI tools: responsible use, verification of outputs and protection of confidential data.
- Developers and data scientists: model lifecycle, bias testing, security and documentation obligations.

Training is delivered through our corporate learning platform, completion rates are monitored, and content is updated in line with technological and regulatory developments.

11. External Verification

We aim to confirm the maturity of our AI management system through independent verification. Our electricity distribution company Osmangazi Elektrik Dağıtım A.Ş. (OEDAŞ), part of our Group, holds the ISO/IEC 42001 Artificial Intelligence Management System certificate. This implementation serves as a reference for wider roll-out across the Group, and extending the certification scope to further legal entities is under evaluation.

In addition, our sustainability performance data is subject to independent assurance engagements.

12. Review and Contact

This statement and the underlying Responsible Artificial Intelligence Policy are reviewed and updated as needed in line with technological developments, regulatory changes and stakeholder expectations. Questions, comments and reports regarding our responsible AI practices may be submitted through the Company's corporate communication and ethics reporting channels.