

TURNER POLICY: ENVIRONMENTAL

Issued by: ESG Department

Approved by: ESG Committee

Approved Date: 07/01/2025

Last Revision: 06/15/2026

SUMMARY

1. Summary

Turner's Environmental Policy establishes our commitment to embedding environmental stewardship throughout our operations and value chain. It describes the proactive due diligence process used to identify, assess, prioritize, prevent, mitigate and when necessary remediate environmental impacts associated with our projects, services and business partners. This policy supports our ESG strategy by setting clear principles and commitments that guide our efforts in decarbonization, sustainable construction and the energy transition.

2. Purpose

This policy provides a structured framework to guide environmental decision making and daily practices at Turner. It defines the roles and responsibilities of all members of the organization and promotes consistent application of environmental standards across our global operations. By outlining key commitments such as compliance with applicable laws, continuous improvement in environmental performance, transparency in reporting and stakeholder engagement, it ensures we manage environmental risks effectively and achieve sustainable outcomes.

3. Scope and Use

This policy applies to The Turner Corporation, its subsidiaries, and joint ventures of which they are a member (collectively, "Turner" or the "Company").

POLICY

INTRODUCTION

Turner's sustainability (ESG) strategy is focused on decarbonizing our operations, expanding our work in sustainable construction, the energy transition, and acting responsibly to support our employees and the communities in which we operate.

By means of this Environmental Policy (hereinafter the "**Policy**"), Turner undertakes the formalization of a due diligence process through a proactive approach that enables the effective adoption of appropriate measures to identify, evaluate, prioritize, prevent, mitigate, and, where appropriate, repair actual or potential adverse impacts on the environment related to its products, services and operations and those of natural or legal persons with whom Turner maintains a commercial or business agreement (hereinafter the "**Business Partners**") along the Chain of Activities.

The principles established in this Policy must be interpreted and complemented by different internal policies and Standards that make up the Turner Governance System; these include, among others, the Code of Conduct, the Turner ESG Strategy, the Human Rights Policy, the Code of Conduct for Business Partners, the Corporate Sustainability Due Diligence Protocol and the General Risk Control and Management Policy.

DEFINITIONS

For the purposes of this Policy, the following terms shall be interpreted in accordance with the definitions set forth below:

- **Chain of activities:** The activities of the Business Partners involved in the upstream and downstream phases of activities relating to the production of goods or the provision of services by Turner and its subsidiary companies and joint ventures.

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- **Code of Conduct:** Turner's Code of Conduct.
- **Code of Conduct for Business Partners:** The Code of Conduct for Business Partners of Turner.
- **Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859:** the Corporate Sustainability Due Diligence Directive.
- **Human Rights:** Human rights.
- **Interest Groups/Stakeholders:** those collectives that may affect or be affected by the activities of Turner and, in particular, the directors, managers, employees, trade unions and Business Partners of the Group, as well as consumers, groupings, communities or entities whose rights or interests are or could be affected by the products, services and operations of the Company, its subsidiaries and/or its Business Partners, including national environmental and human rights institutions, civil society organizations whose purposes include the protection of the environment and the legitimate representatives of such persons, groupings, communities or entities.
- **IROs:** Impacts, risks and opportunities.
- **Members of the Organization:** members of the governing bodies, managers, employees, workers or temporary employees or employees hired under a collaboration agreement, and interns or volunteers of Turner.
- **Standard/s:** Turner corporate texts of a different nature, such as Policies, Regulations or Procedures, among other texts, which, where applicable, project onto subsidiary companies and joint ventures.
- **UN:** United Nations.
- **OECD:** Organization for Economic Cooperation and Development.
- **Environmental Policy:** Turner's Environmental Policy.
- **Human Rights Policy:** Turner's Human Rights Policy.
- **General Risk Control and Management Policy:** Turner's General Risk Control and Management Policy.
- **Due Diligence Protocol/Protocol:** The Corporate Due Diligence Protocol on Sustainability.
- **Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation:** Regulation on marketing and export associated with deforestation.
- **Business Partners:** Any legal or natural person with whom Turner maintains a commercial or business agreement in their Chains of activities. These include, by way of example, but are not limited to, suppliers or providers of goods or services, intermediaries such as agents or commission agents, external advisors or *joint ventures*.
- **EU:** European Union.

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- **Turner:** The Turner Corporation and any subsidiary companies and joint venture projects

SCOPE OF APPLICATION

This Policy is applicable to all Turner activities, and compliance therewith is therefore mandatory for members of the governing bodies, managers, employees, workers or temporary employees or those covered by collaboration agreements, and Turner interns or volunteers (hereinafter the "**Members of the Organization**"), encouraging all staff to perform under the same paradigm, while implementing this Policy throughout the entire Turner chain of activities, and projecting the commitments made in this Policy onto subsidiary companies and joint ventures.

Likewise, Turner's subsidiary companies will monitor that the principles of the Policy are applied, where applicable and to the extent appropriate, to the Business Partners, thus taking into account the Chain of Activities.

Turner will also promote the application of the principles of this Policy with respect to participating entities and, where appropriate, with respect to joint ventures and other equivalent associations, whether national or foreign.

In turn, in the implementation of the principles of the Policy, Turner will collaborate constructively with stakeholders, in order to establish channels of communication, consultation and contacts that contribute to the better performance of Turner and its Business Partners in matters of sustainability.

PRINCIPLES AND COMMITMENTS TO THE ENVIRONMENT

Turner strives to combine business objectives with the protection of the environment and the appropriate management of the legitimate expectations of their stakeholders in this area.

To this end, Turner has defined an environmental management framework governed by the Turner ESG Strategy.

In accordance with the aforementioned premises, this Policy establishes the following commitments:

- **Compliance with generally applicable legislation and regulations**, as well as the commitments established in Turner's ESG Strategy.
- **Supporting of protection of the environment and the sustainable use of air, soil and water** in the areas where the activities are carried out to support the conservation of natural resources and habitats, including the prevention of pollution, based on the evaluation of potential impacts to the environment in each phase of the project, work or service, with the aim of designing processes that allow the environmental impact to be minimized as far as possible.
- **Continuous improvement in environmental performance management** by establishing and monitoring environmental objectives.
- **Information transparency**, through the periodic dissemination and communication of information on the procedures used to manage and supervise environmental IROs and on the general environmental performance of Turner, all in accordance with applicable regulations.
- **Training and awareness-raising** through training and awareness-raising activities for employees, business partners and other stakeholders.

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Turner will use reasonable means available to ensure compliance with the aforementioned commitments to ensure that they are reflected in the operational standards and procedures necessary.

MAIN AREAS OF ACTION

The nature of the activities that form part of the business model of Turner involves direct interaction with the environment. In this sense, the main environmental risks and impacts resulting from these activities are related to the consumption of resources (including the consumption of materials, energy consumption and water consumption), the generation of waste and the possible impact on the natural environment and biodiversity.

To ensure the effectiveness of these environmental commitments, relevant environmental IROs are identified, evaluated and compared with the management system and the priority areas in environmental matters established for Turner's business. In this regard, key objectives and indicators are established for each of these priority areas to monitor environmental performance, as well as improvement programs and action plans by Turner.

Taking into account the identified material environmental IROs, the main environmental measures of Turner will focus specifically and operationally on, among others, the following areas of action: circular economy, energy and emissions, efficient and responsible use of water resources, and biodiversity.

Circular economy

The circular economy emphasizes creating value with fewer resources. Turner supports this shift and has outlined commitments to help move away from a traditional "take-make-dispose" approach. By focusing on a product or service's entire lifecycle—including waste, materials, water, and energy—we aim to involve stakeholders in offering sustainable solutions. We will draw on established practices, like eco-design and recycling, while also exploring new innovations as they emerge.

Turner's activity in this area will be governed by the following basic principles of action:

- Consider and evaluate the main risks and impacts regarding the use of materials and waste management, considering the life cycle of projects and services.
- Promote the use of environmentally-responsible materials.
- Encourage operational models that reduce resource consumption and waste generation, both in terms of quantity and hazard.
- Contribute to extending the usefulness of resources, by-products and waste through encouraging repair, reuse and recycling.
- Identify business opportunities to contribute to the circular economy through activities, products and services.

Energy and emissions.

Turner recognizes that climate change may pose business risks, requiring us to adapt the way we produce and consume. Addressing these challenges calls for collaboration among businesses and the public sector. As part of our commitment to sustainability, Turner is dedicated to helping move toward a low-carbon future by encouraging climate-focused mitigation measures throughout our operations.

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Furthermore, local pollution control is particularly important to ensure the well-being of the communities where Turner operates.

In alignment with our decarbonization goals, improving energy efficiency across all stages of our operations is an important part of reducing greenhouse gas emissions and minimizing environmental impact. We are committed to integrating energy-efficient technologies, practices, and performance monitoring to achieve this.

Turner's activity in this area will be governed by the following basic principles of action:

- Consider and evaluate the climate change impacts of activities, products, services and operations.
- Promote energy efficiency as a foundational principle in project design, construction methods, and operational decision-making.
- Make a reasonable effort to avoid or minimize energy consumption and emissions of greenhouse gases generated by activities.
- Establish greenhouse gas emission reduction targets aligned with the latest recommendations and standards.
- Support the reduction of pollution generated by activities, consisting of emissions into the atmosphere, noise and vibrations or light pollution.
- Integrate energy-efficient technologies and renewable energy sources, where feasible, to reduce dependence on fossil fuels and improve performance.
- Incorporate life cycle thinking into the planning, procurement and delivery of construction activities.
- Establish energy use and emissions management mechanisms that enable the objective measurement of performance developments and facilitate decision-making.
- Identify opportunities to promote environmentally-friendly products and services that are adapted to the potential impacts of climate change and contribute to the transition towards a low-carbon economy.

Efficient and responsible use of water resources

Turner recognizes the importance of water to our operations. We're committed to using water efficiently, expanding recycling and reuse, and protecting water resources through responsible conservation measures.

Turner's actions in this area will be governed by the following basic principles of action:

- Consider and evaluate the main risks and impacts regarding the use of water resources.
- As practicable, apply measures to optimize water consumption and reduce the volume and risk of discharges in the development of its activities and services.
- Identify business opportunities that contribute to the efficient use of water resources, the reduction of water stress and the reduction of discharges.

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- Establish water management mechanisms that enable the objective measurement of performance developments and facilitate decision-making.
- Proactively offer sustainable solutions and involve Business Partners in the Supply Chain, to the extent possible, in the development and implementation of these solutions.

Biodiversity

In growing our business, Turner recognizes that our activities can affect ecosystems. That's why we aim to balance development with conserving biodiversity and natural resources, while supporting measures to prevent deforestation. We pay special attention to areas with ecological, scenic, scientific, or cultural value, guided by the following core principles:

- Implement recommended management plans to preserve or restore biodiversity in those activities or services that have a significant impact on ecosystems.
- Support the prevention of deforestation arising from activities and also from those of Business Partners whose contracted activity is critical to avoiding deforestation, through Supplier Code of Conduct obligations and actions such as promoting the use of climate-smart wood.

Turner supports measures for flora and fauna conservation based on:

- As practical, the physical protection, transplantation or transfer, as well as respect for the life cycles of the affected plant and animal species in areas identified as an environmental risk.

POLICY IMPLEMENTATION

The responsibility for managing and supervising the environmental performance of Turner based on the strategic guidelines established by Turner will be achieved through appropriate action plans and improvement programs, as well as the adoption of appropriate measures to reduce and mitigate the environmental impacts related to Turner's activities.

To this end, Turner will encourage the establishment of mechanisms and procedures to promote compliance with the principles of this Policy, including the following:

- **Carry out activities in accordance with current legislation** in the area.
- **Pursue continuous improvement in environmental matters**, implementing an environmental management system that ensures compliance with the Standards, the establishment and monitoring of measurable objectives in this area that enable the evaluation of the evolution of performance and its consideration in decision-making processes.
- **Monitor the environmental impact in respective Chains of activities.**
- **Promote and encourage Business Partners to have their own environmental policy and to comply with the provisions established in the Code of Conduct for Business Partners.** If they do not have their own policy on the matter, they can reference Turner's environmental policy, extending best sustainability practices to the entire Chain of activities.
- **Incorporate non-financial criteria, including sustainability criteria, in the review of Business Partners.**

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- **Consider, in contracting processes with third parties, criteria that take into account environmental performance**, as well as the implementation of programs that support the alignment of their operations with the commitments assumed by Turner in environmental matters, as possible.
- **Promote training and awareness** of employees regarding environmental aspects through specific programs, as a method to raise awareness and instill the principles established in this Policy.
- **Promote actions aimed at raising awareness among customers and business partners** regarding the aspects covered under this Policy.
- **Encourage participation or association** with external organizations of recognized prestige that promote compliance with the principles of this Policy.
- **In the case of corporate operations**, analyze the impact thereof in accordance with the principles established in this Policy.

Turner will adopt, as possible, appropriate measures necessary to identify, evaluate, prioritize, prevent, mitigate adverse impacts and risks on the environment identified, complying with the provisions established in the Due Diligence Protocol.

These procedures and their results are monitored and reviewed periodically to ensure their correct functioning and results, including, to the extent possible and reasonable, the participation of the stakeholders, in accordance with the provisions established in the Protocol.

GOVERNANCE

This Policy includes the bases of Turner's governance in sustainability matters as established in the Turner ESG Strategy.

WHISTLE-BLOWING AND COMPLAINTS CHANNELS

All Members of the Organization and, in general, authorized persons who are aware of or have reasonable suspicion of any breach of the commitments undertaken in this Policy must report said breach through the channels provided for this purpose.

Email: compliance@tcco.com

Internal Hotline: 1-212-229-6485

External Hotline: 1-888-738-1924

<https://turnerconstruction.navexone.com>



International Hotline:

1-888-738-1924

<https://iwf.tnwgrc.com/turnerinternational>

APPROVAL, DISSEMINATION, ENTRY INTO FORCE AND VALIDITY

This Policy will be applicable after its approval on the date indicated at the beginning [of this document], and shall be of mandatory application from that moment forward, without prejudice to the fact that Turner and its

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subsidiaries and joint ventures may avail themselves of the deadlines provided for in the applicable regulations with respect to the enforceability of sustainability due diligence obligations.

The Policy shall be available on the Company's website (www.turnerconstruction.com) and shall be communicated to all subsidiaries and joint ventures.

ADDITIONAL CONSIDERATIONS

Although this Standard may be translated into different languages, the official version thereof, for the purposes of interpretation, shall be the English version.