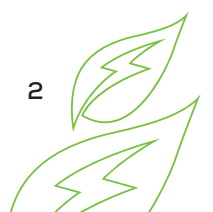




CONTENTS

1. INTRODUCTION	6
1.1. About Smart Solar Technologies	6
1.2. Purpose and Objectives	6
1.3. Scope	7
2. DEFINITIONS AND ABBREVIATIONS	8
3. ELECTRONIC WASTE MANAGEMENT STRATEGY	11
3.1. Prevention, Reduction and Reuse	12
3.2. Recycling, Energy Recovery	12
3.3. Disposal	12
4. CLASSIFICATION OF E-WASTE	13
5. CURRENT SITUATION ANALYSIS	16
6. ENVIRONMENTAL IMPACTS OF ELECTRONIC WASTE	17
7. E-WASTE COLLECTION, STORAGE and TRANSPORTATION PROCESSES	18
7.1. Collection of E-Waste	18
7.2. Storage of E-Waste	18
7.3. Transportation of E-Waste to Licensed Facilities	19
7.4. Monitoring Records	19
8. LEGAL OBLIGATIONS AND COMPLIANCE	20
8.1. General Principles	20
8.2. Obligations of Manufacturers	21
8.3. Obligations of Consumers/End Users	24
9. EMERGENCY PREPAREDNESS AND RESPONSE	26
10. RISK AND OPPORTUNITY ASSESSMENT	27
11. ROLES AND RESPONSIBILITIES	28

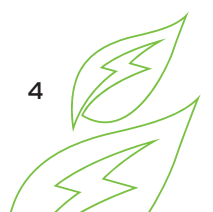


12. TRAINING, AWARENESS RAISING AND STAKEHOLDER ENGAGEMENT	29
12.1. Training	29
12.2. E-Waste Collection Campaign	30
12.3. Environmental Awareness Raising Activities	31
13. CONTINUOUS IMPROVEMENT STRATEGY	32
14. REVIEW OF THE PLAN	33



LIST OF TABLES

Table 1. ESG Compliance Chart	7
Table 2. Domestic and Non-Domestic WEEE Codes	13
Table 3. Classification of Potential E-Waste in Facilities	14
Table 4. Environmental Impacts of E-Waste	17
Table 5. Legal Obligation Compliance Table	25
Table 6. Roles and Responsibilities	28



LIST OF FIGURES

Figure 1. Waste Management Hierarchy	11
Figure 2. Waste Bin Definitions of Hazardous E-Waste	18
Figure 3. E-Waste Collection Campaign Poster	30



1. INTRODUCTION

1.1. About Smart Solar Technologies

Founded in Istanbul in 2014, Smart Solar Energy Technologies Research Development Production Industry and Trade Inc. (Smart Solar Technologies) is a leading integrated renewable energy technology company operating across the renewable energy value chain. With its R&D focused structure and innovative approach, it offers end-to-end solutions in a wide range of areas, from integrated production of solar panels, solar cells and wafers to turnkey solar power plant installation, energy storage systems, electric vehicle charging infrastructure and green hydrogen solutions. Smart Solar Technologies, which supports the transition to a low-carbon economy by developing innovative solutions for renewable energy production, leverages its advanced manufacturing infrastructure in Türkiye and international growth strategy. Smart Solar Technologies, which is traded on Borsa Istanbul with the code SMRTG and is included in the Sustainability Index, is one of the companies that attract attention with its strong and sustainable growth target. The company operates in Türkiye with two high-tech production facilities located in Gebze and Aliğa.

1.2. Purpose and Objectives

The purpose of the Electronic Waste (E-Waste) Management Plan is to ensure that electronic waste (e-waste) generated within Smart Solar Technologies is managed in accordance with national legislation, international standards and ESG criteria while preventing adverse environmental impacts.

The plan covers the management of both consumer-generated waste (office equipment, small household appliances, etc.) and production process-generated waste (solar panel modules, manufacturing defect parts, etc.). The E-Waste Management Plan has been prepared with reference to the basic principles of the Regulation on the Management of Waste Electrical and Electronic Equipment and the EU WEEE Directive (2012/19/EU) in force in Türkiye; It supports Smart Solar Technologies' carbon footprint reduction and circularity goals based on producer responsibility, life cycle approach, waste separation and recycling and minimising environmental impacts. Based on the principles of circular economy and resource efficiency, it aims to prevent the formation of waste electrical and electronic equipment (WEEE), to collect WEEE separately when it cannot be prevented and to create a reuse alternative to reduce the amount of WEEE, to determine recycling methods and targets, and to manage waste electrical and electronic equipment in a way that does not harm the environment and human health within the integrated waste management system. The compliance table containing the activities corresponding to the ESG criteria and sustainable development goals is given below.

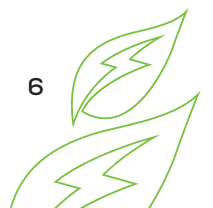


Table 1. ESG Alignment Matrix

ESG Criteria	Goal / Activity	SDG Code and Purpose
Environmental (E)	Reducing carbon footprint	SDG 13 – Climate Action
Environmental (E)	Circular economy and resource efficiency	SDG 12 – Responsible Consumption and Production
Environmental (E)	Waste separation and recovery	SDG 12 – Responsible Consumption and Production
Environmental (E)	Life cycle approach	SDG 12 – Responsible Consumption and Production SDG 9 – Industry, Innovation and Infrastructure
Environmental (E)	Not harming the environment and human health	SDG 3 – Health and Well-being; SDG 6 – Clean Water and Sanitation
Governance (G)	Legal and regulatory compliance	SDG 16 – Peace, Justice and Strong Institutions SDG 12 – Responsible Consumption and Production
Governance (G)	Integrated waste management system	SDG 12 – Responsible Consumption and Production
Governance (G)	Setting and monitoring goals	SDG 12 – Responsible Consumption and Production SDG 13 – Climate Action
Social (S)	Human health and safety	SDG 3 – Health and Well-being SDG 8 – Decent Work and Economic Growth

1.3. Scope

This plan covers all e-waste generated at Smart Solar Technologies:

- **Consumer and End-User E-Waste:** Computers, keyboards, mice, printers, phones, projectors, white goods, small electronic devices, switches, relays, contactors, cables.
- **E-Waste From Product Life Cycle and E-Waste within the Scope of Customer Return Program:** Photovoltaic Panels.
- **Production-Related E-Waste:** It covers all legal and operational processes, including Photovoltaic Panels, defective cells, cards, inverter parts, components used for testing and calibration activities that subsequently become waste.



2. DEFINITIONS AND ABBREVIATIONS

ADR (Accord Européen Relatif Au Transport International Des Marchandises Dangereuses Par Route): European Agreement on the International Carriage of Dangerous Goods by Road.

Waste Electrical and Electronic Equipment (WEEE/E-Waste): Electrical and electronic equipment that complies with the definition of waste in the Waste Management Regulation published in the Official Gazette dated 02/04/2015 and numbered 29314, and all components, elements and consumables they contain at the time of waste.

Waste Electrical and Electronic Equipment Processing: Recycling or disposal processes, including preliminary processes such as purification, dismantling, shredding, as specified in Annex-2/A and Annex-2/B of the Waste Management Regulation.

Disposal: The process defined in subparagraph (ö) of the first paragraph of Article 4 of the Waste Management Regulation; any of the processes included in Annex-2/A, which is not regarded as a recovery operation even if its secondary purpose is energy recovery.

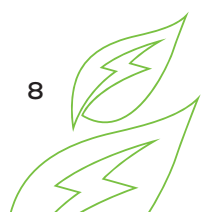
BIST Sustainability Index: A stock market index that lists BIST companies according to their ESG performance.

Component: Each separate part that must be brought together for the operation of electrical and electronic equipment, that does not have a direct function on its own for the consumer/end user and does not qualify as a final product.

CDP (Carbon Disclosure Project): Carbon Disclosure Project.

Environmental Permit and License Certificate: Temporary activity certificate/environmental permit and license certificate issued within the scope of the Environmental Permit and License Regulation published in the Official Gazette dated 10/09/2014 and numbered 29115.

EEE Information System: An online program prepared/commissioned by the ministry where declarations and notifications regarding electrical and electronic equipment within the scope of the WEEE Regulation will be made, and information and documents regarding the studies within the scope of extended producer responsibility practices will be presented.



Electrical and Electronic Equipment (EEE): Goods that are included in the categories in Annex-1/A and Annex-2/A of the WEEE Regulation and are designed for use not exceeding 1000 Volts with alternating current and 1500 Volts with direct current, and that are dependent on electric current or electromagnetic field for proper operation, and goods used for the generation, transfer and measurement of these currents and fields.

ESG: Refers to sustainability and corporate responsibility criteria used to evaluate organizations' performance regarding their environmental impacts, social responsibilities, and corporate governance practices.

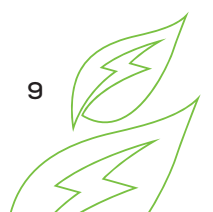
Domestic WEEE: WEEE originating from households and originating from commercial, institutional, industrial, and other sources that are similar to those originating from households in terms of their characteristics and quantity, and WEEE originating from EEEs that are likely to be used by both households and non-household users.

Extended Producer Responsibility (EPR): Defined in subparagraph (y) of the first paragraph of Article 4 of the Waste Management Regulation; one of the methods to be used to support design, production and sales that takes into account the efficient use of products throughout their life cycle, including repair, reuse, shredding and recycling processes, in order to use resources effectively without compromising their free circulation in the market, and facilitates this use. It refers to the principle under which producers assume responsibility for products throughout their life cycle, including collection, reuse, recycling and final treatment.

Recycling: The process defined in subparagraph (z) of the first paragraph of Article 4 of the Waste Management Regulation; Any recycling process in which wastes are processed and converted into products, materials or substances for their original purpose or other purposes, including the reprocessing of organic materials, except for energy recovery and use as fuel or reprocessing of wastes for filling.

Recovery: The process defined in subparagraph (aa) of the first paragraph of Article 4 of the Waste Management Regulation; the processes listed in Annex-2/B, which are involved in making wastes ready for use for a useful purpose in order to replace the substances used in the market or in a facility.

MOTAT: Mobile Waste Tracking System.



Hazardous Waste: Wastes that have one or more of the hazardous characteristics in Annex-3/A of the Waste Management Regulation and have an asterisk (*) sign next to the six-digit waste code in Annex-4 of the same Regulation.

Non-Hazardous Waste: Wastes that do not have an asterisk (*) sign in the Annex-4 waste list of the Waste Management Regulation.

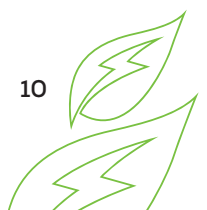
TÜÇA: Turkish Environment Agency.

Consumer/End User: The natural or legal person using EEE.

ESG Score: A performance score assigned by international sustainability rating agencies based on an organisation's environmental, social and governance performance.

Manufacturer Registration Number: The registration number obtained when registering in the EEE information system.

Reuse: The process defined in subparagraph (öö) of the first paragraph of Article 4 of the Waste Management Regulation; any process in which products or non-waste components are used for the same purpose as designed.



3. ELECTRONIC WASTE MANAGEMENT STRATEGY

Sustainable e-waste management practices within the Electrical and Electronic Waste Management Plan contribute significantly to reducing greenhouse gas emissions, as well as to protecting natural resources, increasing energy efficiency, and reducing waste and environmental risks. The primary production of some metals, which are components of e-waste (e.g. mining, concentration, smelting and refining processes), leads to significant carbon dioxide (CO₂) emissions, especially due to the low concentration of precious and special metals in ores and the difficult mining conditions. However, the recovery of these metals through the mining of old phones, servers or computers requires only a very small energy expenditure compared to mineral extraction from ores in nature when done in an environmentally sound manner and safe way.

The environmental footprint of e-waste can be significantly reduced by environmentally safely managed E-Waste Management Practices, preventing hazardous emissions and ensuring that a large proportion of the metals they contain are recovered for use in new products.

E-waste is defined in the Environmental Waste Management Procedure established under the ISO 14001:2015 Environmental Management System in Smart Solar Technologies facilities.

Our Electrical and E-Waste Management strategy is as follows in parallel with the waste management hierarchy;

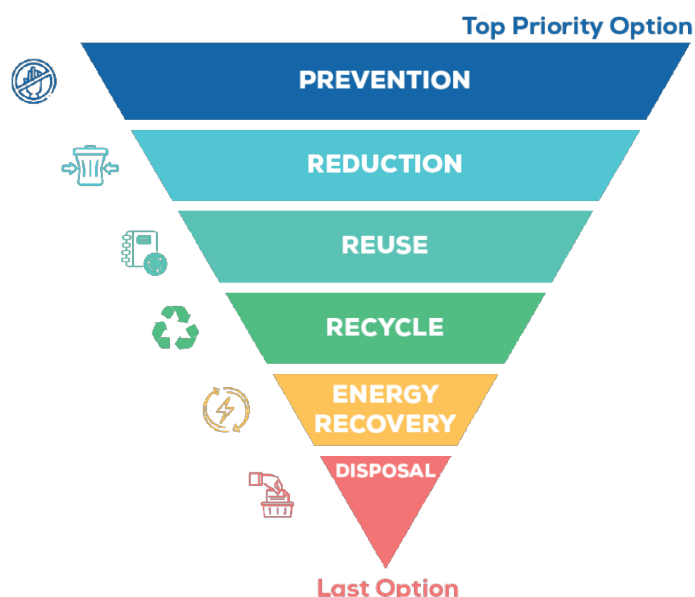


Figure 1. Waste Management Hierarchy



1.3. Scope

- Preferring environmentally friendly, long-lasting, modular and repairable products.
- Preventing premature obsolescence of products through software updates.
- Extending equipment lifespan through regular maintenance protocols.
- Reusing unused but working products in different units.
- Ensuring that suppliers are provided with environmentally friendly products that meet the criteria of low carbon footprint and use of recyclable materials in production processes. Reducing unnecessary device replacements through internal communication.
- Evaluation of leasing and shared use models instead of purchasing.
- Repairing and refurbishing devices that are out of use.
- Enabling the use of Photovoltaic Panels, which are decided to be produced outside the project norm quality standards or whose power efficiency decreases in the fields, in areas that can be managed with applications with lower energy demand within the scope of social responsibility.
- Assessment of upcycling potential, industrial symbiosis at pilot scale Smart Solar Technologies aims to implement pilot projects that promote reuse, upcycling and social value creation through circular economy initiatives.

3.2. Recycling, Energy Recovery

- Separate accumulation of e-waste at the source.
- Classification of e-waste according to its characteristics.
- Separate accumulation of hazardous and non-hazardous e-waste.
- Making agreements with licensed recycling facilities.
- Making agreements with licensed RDF (Waste Derived Fuel) facilities for energy recovery from materials that cannot be recycled.

3.3. Disposal

Prevention, reduction, reuse, recovery and disposal of non-recyclable e-waste in licensed facilities to prevent its possible effects on human health and the environment.



4. CLASSIFICATION OF E-WASTE

The e-waste code definitions in the Waste Management Regulation are specified in Table-2, and in this context, the waste code classification of e-waste generated or expected to arise in Smart Solar Technologies is specified in.

Table 2. Domestic and Non-Domestic WEEE Codes

Waste Code	SDG Code and Purpose
Domestic WEEE	
20 01	Separately Collected Factions (Except 15 01)
20 01 21*	Fluorescent lamps and other mercury-containing waste
20 01 23*	Discarded equipment containing chlorofluorocarbons
20 01 35*	Discarded electrical and electronic equipment containing hazardous parts other than 20 01 21 and 20 01 23
20 01 36	Discarded electrical and electronic equipment other than 20 01 21, 20 01 23 and 20 01 35
Non-Domestic WEEE	
16 02	Electrical and Electronic Equipment Waste
16 02 09*	Transformers and capacitors containing PCBs
16 02 10*	16 02 09 Scrap equipment containing or contaminated with PCBs
16 02 11*	Discarded equipment containing chlorofluorocarbons, HCFCs, HFCs
16 02 12*	Discarded equipment containing free asbestos
16 02 13*	Discarded equipment containing hazardous parts other than those from 16 02 09 to 16 02 12
16 02 14	Discarded equipment other than those from 16 02 09 to 16 02 13

In this plan, e-waste is classified with reference to the equipment categories defined in Annex-III and Annex-IV of the Regulation on the Management of Waste Electrical and Electronic Equipment and the EU WEEE Directive (2012/19/EU) in force in Türkiye.

E-waste generated/may occur in Smart Solar Technologies facilities are certified and monitored within the scope of ISO 14001:2015 Environmental Management System.

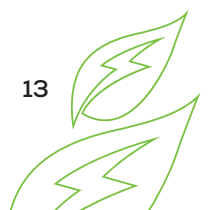
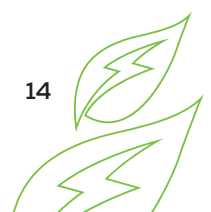
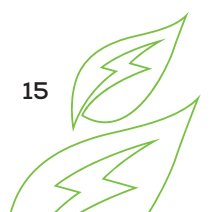


Table 3. Classification of Potential E-Waste in Facilities

Waste Code	Waste Type	Hazard Status	Waste Source	Waste Source Activity	Transaction Code
16 02 14	Photovoltaic Panels	Non-hazardous	Production/ Consumer/End User/Product End of Life	Production Activity	R12
20 01 35*	Contactor, Relay, Switch	Hazardous	Consumer/ End User	Maintenance Activity	R12
17 04 11	Cable	Non-hazardous	Consumer/ End User	Maintenance Activity	R12
17 04 11*	Oily Cable	Hazardous	Consumer/ End User	Maintenance Activity	R12
16 02 15*	Electric Motor	Hazardous	Consumer/ End User	Maintenance Activity	R12
20 01 35*	Air conditioning	Hazardous	Consumer/ End User	Maintenance Activity	R12
20 01 35*	Control Panel	Hazardous	Consumer/ End User	Maintenance Activity	R12
20 01 35*	Refrigerator - coolers	Hazardous	Consumer/ End User	General Use	R12
20 01 35*	Dishwasher	Hazardous	Consumer/ End User	General Use	R12
20 01 21*	Fluorescence	Hazardous	Consumer/ End User	General Use	R12
20 01 34	Battery	Non-hazardous	Consumer/ End User	General Use	R4
16 06 01*	Battery	Hazardous	Consumer/ End User	Shipment, Warehouse Activity	R13
16 02 15*	Motherboard	Hazardous	Consumer/ End User	IT Activity	R12
20 01 35*	Computer-Laptop	Hazardous	Consumer/ End User	IT Activity	R12
20 01 35*	Mouse	Hazardous	Consumer/ End User	IT Activity	R12
20 01 35*	Keyboard	Hazardous	Consumer/ End User	IT Activity	R12



Waste Code	Waste Type	Hazard Status	Waste Source	Waste Source Activity	Transaction Code
16 02 15*	J-Box	Hazardous	Production/ Consumer/ End User/ Product Life	Production Activity	R12
20 01 35*	Printer	Hazardous	Consumer/ End User	IT Activity	R12
20 01 35*	Coffee Maker	Hazardous	Consumer/ End User	General Use	R12
20 01 35*	Document Shredder	Hazardous	Consumer/ End User	General Use	R12
20 01 35*	Cordless Drill/ Screwdriver	Hazardous	Consumer/ End User	Maintenance Activity	R12
20 01 35*	Soldering iron	Hazardous	Consumer/ End User	Production Activity	R12
20 01 35*	Mobile Phone	Hazardous	Consumer/ End User	General Use	R12
20 01 35*	Automatic Paper Towel Dispenser	Hazardous	Consumer/ End User	General Use	R12
20 01 35*	Compressor	Hazardous	Consumer/ End User	Maintenance Activity	R12
16 02 15*	Capacitor	Hazardous	Consumer/ End User	Maintenance Activity	R12



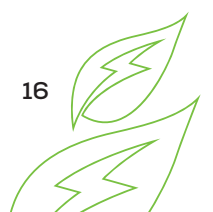
5. CURRENT SITUATION ANALYSIS

E-waste generated within Smart Solar Technologies' facilities arises from production processes, research and development activities, maintenance operations and office equipment that has reached the end of its useful life. Currently, e-waste management is carried out in accordance with internal procedures, legal requirements, producer responsibility principles, employee awareness programmes and the Company's sustainability commitments.

Standard operating procedures are applied within the facility for the collection, sorting, transportation and routing of e-waste to licensed recovery/disposal facilities. Separate accumulation is carried out by taking into account the hazardous component contents, recyclable material structure and environmental impacts of the equipment. Thus, wastes are prevented from posing a risk to the environment and human health.

Currently, e-waste management; It is carried out in line with employee awareness, internal procedures, legal obligations, the principle of producer responsibility and sustainability commitments.

The Company has established the necessary infrastructure to continuously improve recovery rates and monitor e-waste management performance.



6. ENVIRONMENTAL IMPACTS OF ELECTRONIC WASTE

Electrical and electronic equipment contains a variety of hazardous materials that harm human health and the environment. While some substances found naturally in nature are harmless, compounds formed as a result of their use in the production of electronic equipment (e.g., chromium VI) can become dangerous. Lead, mercury, cadmium, and polybrominated flame retardants are among the persistent, bioaccumulative toxins (PBTs) found in electronic equipment. These substances pose environmental and health risks during the production, incineration, burial of electronic equipment in the ground, or melting during recycling.

Improper management of Waste Electrical and Electronic Equipment (WEEE) can have negative effects on the environment, society and human health because it contains base metals such as copper (Cu) and zinc (Zn), as well as toxic heavy metals such as cadmium (Cd) and mercury (Hg) and metal compounds such as iron oxide (Fe₂O₃).

Table 4. Environmental Impacts of E-Waste

Environmental Impact	Control/Prevention Applications
Air Pollution	The release of carcinogenic gases is prevented by shipping e-waste to licensed facilities and appropriate processing/recycling processes.
Soil Pollution	E-Waste is stored on impermeable ground in physical conditions that will not receive precipitation within the framework of the legislation, preventing the leakage of heavy metals into the soil.
Water Pollution	E-Waste is stored on impermeable ground in physical conditions that will not receive precipitation within the framework of the legislation, preventing hazardous substances from contaminating soil and groundwater.
Human Health	In order to prevent employees from being exposed to harmful substances in e-waste, it is collected separately at the source and stored in temporary waste storage areas under physical conditions in accordance with the legislation. It is shipped to licensed electronic recycling/recovery facilities.



7. ELECTRONIC WASTE COLLECTION, STORAGE AND TRANSPORTATION PROCESSES

7.1. Collection of E-Waste

- E-waste within the facility is collected separately at the source in the defined waste bins at the points where they are generated.
- E-waste is collected in accordance with the Waste Management Regulation and the Regulation on the Management of Waste Electrical and Electronic Equipment before being transferred to the temporary waste storage area.

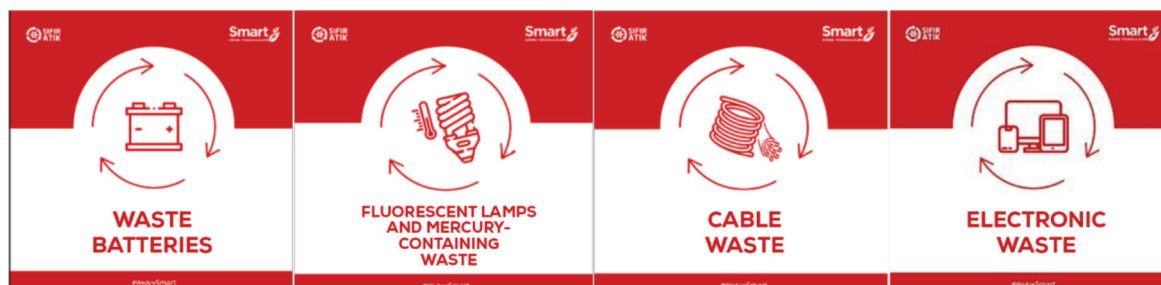


Figure 2. Waste Bin Definitions of Hazardous E-Waste

7.2. Storage of E-Waste

- In the defined area where a Temporary Waste Storage Permit has been granted by the Provincial Directorate of Environment, Urbanization and Climate Change, storage is carried out in accordance with the maximum storage periods specified in the applicable legislation.
- The temporary storage of e-waste is carried out; in accordance with the Waste Management Regulation (Official Gazette No. 29314 dated 2 April 2015). It is carried out within the framework of the Regulation on the Control of Hazardous Wastes (RG: 14.03.2005/25755) and relevant technical standards. In this context, the basic operational requirements that must be implemented to ensure that e-waste is managed in a safe and traceable manner without posing environmental risks are presented below.
- **Classification of Waste:** Hazardous and non-hazardous e-waste is stored separately.
- **Separation of Waste:** E-waste is stored in separate cells according to waste category (e.g., batteries, PCB-containing parts, solar panel modules).
- **Labeling:** Each cell is labeled with waste codes, type information, and storage date.
- **Isolation of Hazardous Wastes:** Wastes containing chemicals or toxins are kept in special compartments isolated from other wastes.



- **Fire Safety:** The storage area is equipped with appropriate fire detection and fire suppression systems in accordance with applicable fire safety regulations.
- **Ventilation:** Adequate ventilation is provided to prevent the accumulation of dust or hazardous gases generated from stored e-waste.
- **Floor and Seepage Precautions:** The storage area is designed with an impermeable, chemically resistant floor and an appropriate drainage slope to contain potential leaks or spills.
- **Structural Durability:** The roof and walls of the area are built to withstand weather conditions and external influences.
- **Access Control:** Access to the storage area is restricted to authorised and trained personnel only.
- **Safe Transfer and Recording:** Safety procedures are implemented during transfer from the temporary storage area and the amount, type, and transfer date of the transported waste are recorded.
- **Handling Precautions:** During transportation to recycling or final disposal facilities, appropriate packaging methods and licensed transport vehicles are used to prevent leakage, breakage or spillage.
- **Storage Period Tracking:** Waste is stored taking into account the maximum storage periods specified in the legislation and is sent to a licensed facility at the end of this period.
- **Documentation and Traceability:** All storage and transfer transactions are recorded, ensuring traceability and ensuring full traceability and audit readiness.

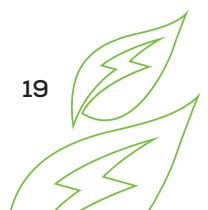
7.3. Transportation of E-Waste to Licensed Facilities

- Recycling/recovery/disposal of Electronic Waste is carried out through facilities licensed by the Ministry of Environment, Urbanization and Climate Change.
- If e-waste is hazardous, it is transported to a licensed facility using licensed vehicles compliant with the ADR (European Agreement concerning the International Carriage of Dangerous Goods by Road) Regulation, accompanied by a Mobile Waste Transport Tracking System. If e-waste is non-hazardous, no special license is required for transport; however, compliance with appropriate transport conditions is ensured.

7.4. Tracking Records

The collection, storage, or shipment process of e-waste is recorded within the scope of relevant regulations and standards. Hazardous wastes can be temporarily stored for a maximum of 180 days in accordance with the Waste Management Regulation. Before this period passes, the process of sending to the licensed facility begins.

Hazardous waste shipments are managed and tracked through the National Environmental Information System (UÇBS) via the Mobile Waste Transport Tracking System (MOTAT), ensuring full traceability, compliance with applicable legal requirements and proper documentation throughout the transportation process.



8. LEGAL OBLIGATIONS AND COMPLIANCE

Smart Solar Technologies ensures compliance with and maintains records of all obligations within the scope of National Environmental Legislation and EU WEEE Directive (2012/19/EU) within the scope of ISO 14001:2015 Environmental Management System.

Regulation No. 32055 on the Management of Waste Electrical and Electronic Equipment; General Principles, Producer Obligations within the scope of Extended Producer Responsibility and Consumer/end user obligations are summarised below.

8.1. General Principles

ARTICLE 5- (1) By the relevant parties involved in the life cycle of EEEs; ensuring the design and production of EEE in line with the circular economy, sustainable production and consumption and zero waste approach, preventing the formation of WEEE by taking the necessary measures to prevent and reduce waste generation, and in cases where waste generation is inevitable, the amount of waste to be disposed of by first preparing the WEEE for reuse, recycling and recovery it shall be ensured to reduce it.

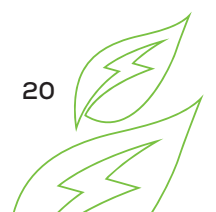
(2) In determining and implementing national-scale strategies and policies for the management of electrical and electronic equipment, it shall be ensured to implement the extended producer responsibility principle and the polluter pays principle, and to share responsibilities for electrical and electronic equipment manufacturers and other relevant stakeholders within the scope of extended producer responsibility.

(3) In the design and production of EEEs and their components; Necessary measures are taken to implement eco-design requirements that can be used for a long time without becoming waste by extending the service life of the products, allowing them to be repaired and reused with repair, and facilitating their preparation, recycling or recovery after they become waste.

(4) In order to reduce the use of natural resources and raw materials and increase recycling, priority is given to the use of recycled materials, especially in new design products, if technically appropriate. The Ministry is authorized to determine the issues regarding the use of recycled materials in EEEs and the principles regarding compulsory use.

(5) The collected WEEE is processed in facilities with environmental permits and licenses, and the reuse, recycling and recovery rates in Article 21 are ensured.

(6) WEEEs and their parts, which are technically not technically available for reuse, recycling and recovery, are disposed of in facilities with environmental permits and licenses.



(7) The person or persons and institutions/organizations responsible for the management of electrical and electronic equipment and waste electrical and electronic equipment are obliged to take the necessary measures to reduce the harmful effects of these wastes on the environment and human health. Expenditures incurred for the purpose of eliminating all kinds of environmental damages arising from the management of WEEEs are covered by the real or legal persons responsible for the management of these wastes within the framework of the principle of joint liability.

(8) In the implementation of this Regulation, if the manufacturer defined in sub-paragraph (1) of the same sub-paragraph also has a trademark on the products placed on the market by the manufacturer defined in sub-paragraph (2) of sub-paragraph (hh) of the first paragraph of Article 4, the real or legal persons specified in sub-paragraph (1) of the same paragraph are responsible as the manufacturer of the products.

(9) Real or legal persons who provide finance within the scope of any financial agreement are not considered as producers unless they meet the conditions of the definition of producer specified in subparagraph (hh) of the first paragraph of Article 4.

(10) Waste batteries and accumulators collected together with WEEEs are managed within the scope of the Regulation on the Control of Waste Batteries and Accumulators published in the Official Gazette dated 31/8/2004 and numbered 25569 after they are separated from WEEEs.

(11) Based on the voluntary agreements made within the scope of the Ministry's extended producer responsibility policies and plans, TÜÇA may ensure, support and take over the fulfillment of the responsibilities and obligations of EEE producers. The procedures and principles of the activities to be carried out by TÜÇA within the scope of this Regulation are determined by the Ministry and announced on the website of TÜÇA.

(12) Transactions for the products placed on the market by electrical and electronic equipment manufacturers within the scope of the deposit application are carried out within the framework of the procedures and principles determined by the Ministry.

8.2. Obligations of Manufacturers

ARTICLE 9- (1) EEE manufacturers within the scope of extended producer responsibility;

a) To carry out and/or contribute to educational activities,

b) To design and produce durable, long-lasting, repairable, reusable and rehabilitable products by developing sustainable production and consumption models in order to use resources efficiently,



- c)** To avoid EEE designs or manufacturing processes that would prevent the reuse of used EEEs or the preparation of WEEE for reuse, unless it is necessary for environmental protection and/or safety requirements,
- ç)** To use materials and parts that will facilitate the easy shredding, separation, preparation for reuse, recycling and recovery of products after they become waste during the design and production of EEEs in order to ensure the reuse/recycling and recovery rates specified in this Regulation and to reduce wastes,
- d)** To comply with the regulations made by the Ministry regarding the restriction of the use of some harmful substances in the manufacture of electrical and electronic equipment in order to protect the environment and human health, including environmentally friendly recycling and disposal of electrical and electronic equipment in case they become waste,
- e)** EEEs supplied to the market; In accordance with the Turkish Standard No. TS-EN 50419, which expresses the separate collection of waste after it is wasted, to ensure that it is placed on the goods in a visible, legible and indelible manner by marking it with the symbol in Annex-6, and exceptionally when necessary due to the size or function of the product, to ensure that the symbol is included on the packaging, instructions for use or EEE warranty certificate,
- f)** To convey information about the necessity of collecting WEEEs separately from other household wastes and taking them to appropriate collection points for reuse, recycling or recovery, the meaning of the symbol in Annex-6 and the possible effects of hazardous substances in EEEs on the environment and human health, through the instructions for use of EEEs, sales points and public awareness campaigns,
- g)** To register in the EEE information system of the Ministry, to obtain the EEE producer registration number from the system and to update the information through the system within 30 calendar days in case of any change in the EEE producer information,
- ğ)** To notify the information and documents requested through the EEE information system until the end of March every year,
- h)** To establish, ensure and/or support a system in accordance with the provisions of this Regulation for the collection and processing of WEEEs,
- ı)** To obtain an environmental permit and license certificate from the provincial directorate for the transfer points they have established,
- i)** To organize take-back campaigns for WEEEs individually and/or in cooperation with distributors/distributors at least once a year for the purpose of collecting domestic WEEEs, regardless of their brand, model, manufacturer and content, to announce the campaigns to the public through appropriate communication channels, including social media, and to inform the Ministry about the results of the campaign,
- j)** To cooperate with the relevant parties obliged in this Regulation in order to achieve the collection targets specified in Article 20,



- i)** To organize take-back campaigns for WEEEs individually and/or in cooperation with distributors/distributors at least once a year for the purpose of collecting domestic WEEEs, regardless of their brand, model, manufacturer and content, to announce the campaigns to the public through appropriate communication channels, including social media, and to inform the Ministry about the results of the campaign,
 - j)** To cooperate with the relevant parties obliged in this Regulation in order to achieve the collection targets specified in Article 20,
 - k)** To establish a system for the management of these WEEEs in case it is not technically possible to process the components and parts of WEEE originating from the electrical and electronic equipment it supplies to the market,
 - l)** To inform consumers/users about the separate collection of EEEs when they become waste and to send them to facilities with environmental permits and licenses in order to be managed in harmony with the environment,
 - m)** To give priority to the use of recycled materials, especially in new design products, if technically appropriate,
 - n)** It is obliged to fulfill its obligations within the scope of the Regulation on Recycling Contribution Share published in the Official Gazette dated 31/12/2019 and numbered 30995 fourth repeated.
- (2)** It is obligatory for the manufacturer of EEEs to be placed on the market in Türkiye via remote communication by manufacturers who are not resident in Türkiye to appoint an authorized representative in order to fulfill the obligations in this Regulation. The appointment of an authorized representative is done with written authorization by the manufacturer.
- (3)** EEE producers are responsible for the separate collection, transportation and processing of domestic and non-domestic WEEE when they are involved in any WEEE collection organization, as well as the fulfillment of their reporting obligations in this regard through the EEE information system in line with the information in Annex-4. The Ministry is authorized to request additional information and documents through the EEE Information System.
- (4)** EEE manufacturers may cooperate with waste processing facilities that carry out reuse activities in order to facilitate processes such as dismantling, repair and inspection to be carried out for the reuse of WEEEs and their components.

8.3. Obligations of Consumers/End Users

ARTICLE 11- (1) Consumers/end users of electrical and electronic equipment;

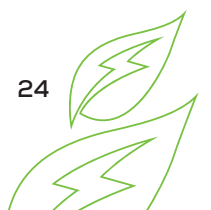
a) To contribute to sustainable consumption, to choose long-lasting, energy-efficient or energy-saving, repairable EEEs, and to evaluate reuse options for used EEEs,

b) Collecting WEEE separately from other household wastes,

c) WEEE to the collection system/collection points established by the municipalities within the zero waste management system, waste collection centers, distributors/distributors, to the collection places/systems established by the producers or WEEE processing facilities,

ç) Not to give their WEEE to those who collect unregistered.

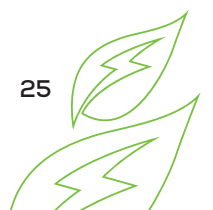
(2) Consumers may redirect used EEE for reuse or qualify it as waste. In the event that they qualify their used EEE as waste, the WEEE producer is obliged to comply with the obligations given in the first paragraph.



The Legal Obligations Compliance Table is stated below;

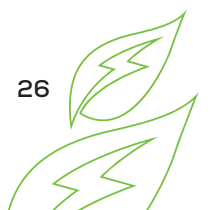
Table 5. Legal Obligation Compliance Table

Legal Regulation	Liability Clause	Legal Compliance Explained
WEEE Regulation	Article-9(1)-g	It registers in the EEE information system of the Ministry, and the EEE manufacturer registration number is obtained from the system.
WEEE Regulation	Article-9(1)-ğ	Within the scope of producer responsibility, WEEE market declaratory is made.
WEEE Regulation	Article-9(1)-a	Within the scope of producer responsibility, training activities are organized and/or contributed to these activities.
WEEE Regulation	Article-9(1)-e	EEEs supplied to the market; TS-EN 50419, which refers to the separate collection of waste after it is in Annex-6 in accordance with the Turkish Standard No. symbol is indicated on the product.
WEEE Regulation	Article-9(1)-i	Domestic WEEE collection campaigns are organized and campaigns are announced to the public through appropriate communication channels, including social media.
WEEE Regulation	Article-9(1)-f	The necessity of collecting WEEEs separately from other household wastes and collecting them separately at the source for reuse, recycling or recovery, the meaning of the symbol in Annex-6 and the possible effects of hazardous substances in EEEs on the environment and human health are discussed. It is conveyed to consumers through awareness campaigns.



9. EMERGENCY PREPAREDNESS AND RESPONSE

Smart Solar Technologies implements emergency preparedness and response measures to effectively manage potential environmental, health and safety risks associated with e-waste management. Appropriate procedures have been established to prevent, respond to and mitigate incidents that may occur during the collection, temporary storage, handling and transportation of e-waste, ensuring the protection of employees, the environment and company assets while maintaining compliance with applicable legal requirements.



10. RISK AND OPPORTUNITY ASSESSMENT

Risks and opportunities that may arise from e-waste are evaluated at least once a year within the framework of the E-Waste Management Plan and are periodically reviewed at the senior management level by integrating them into the company's existing corporate risk and opportunity analysis processes.



11. ROLES AND RESPONSIBILITIES

Table 6. Roles and Responsibilities

Responsibility	Attendant	Unit
E-Waste Management Plan Monitoring/Audit	Environmental Engineer	Sustainability and Corporate Relations Department
Separate Collection of E-Waste at the Source	All Employees	All Departments
Storage of E-Waste in Temporary Storage Area	Temporary Waste Storage Area Supervisor	Administrative Affairs Department
Temporary Waste Storage Area Control	Environmental Engineer	Administrative Affairs Department Sustainability and Corporate Affairs Department
Shipment of E-Waste to Licensed Facility	Temporary Waste Storage Area Supervisor, Administrative Affairs Specialist	Administrative Affairs Department
Waste Exit Procedures For the Shipment of E-Waste	Administrative Affairs Specialist, Purchasing Specialist, Shipping Officer	Administrative Affairs Department Purchasing Department Planning/Shipping Department
Waste Prevention/Reduction Studies	All Employees	All Departments

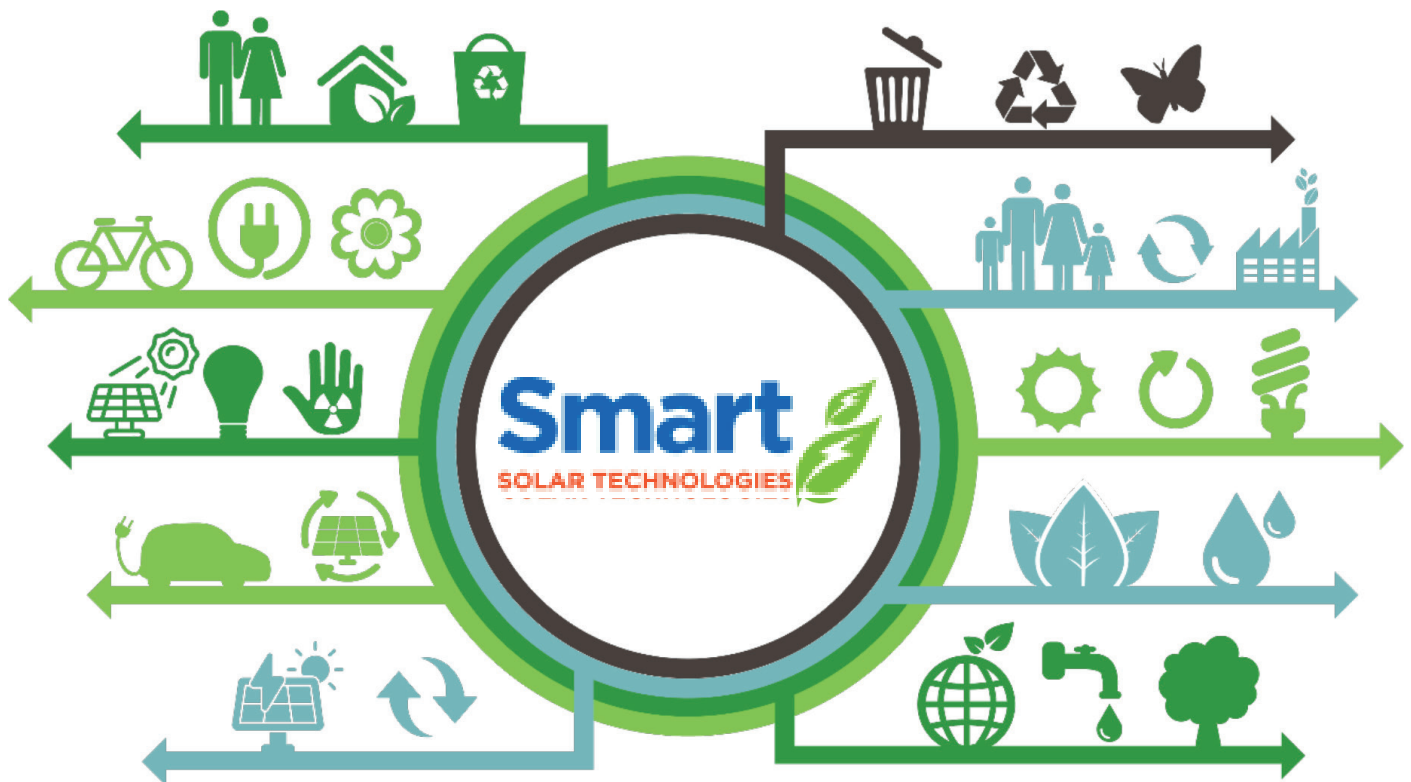


12. TRAINING, AWARENESS RAISING AND STAKEHOLDER ENGAGEMENT

12.1. Training

Smart Solar Technologies provides regular training programmes to employees involved in e-waste management activities to ensure compliance with legal requirements, internal procedures and environmental management practices. The training programme aims to improve employees' knowledge of proper e-waste segregation, temporary storage, handling, emergency response procedures and occupational health and safety requirements.

Training activities are periodically reviewed and updated to reflect changes in legislation, operational processes and best practices in e-waste management.



12.2. E-Waste Collection Campaign

Smart Solar Technologies organises e-waste collection campaigns to encourage the proper collection and recycling of end-of-life electrical and electronic equipment generated by employees and other relevant stakeholders. These campaigns support responsible consumption, resource efficiency and the principles of the circular economy while contributing to environmental protection and increasing recycling rates.

Campaigns are communicated through internal communication channels and supported by dedicated collection points and awareness materials.

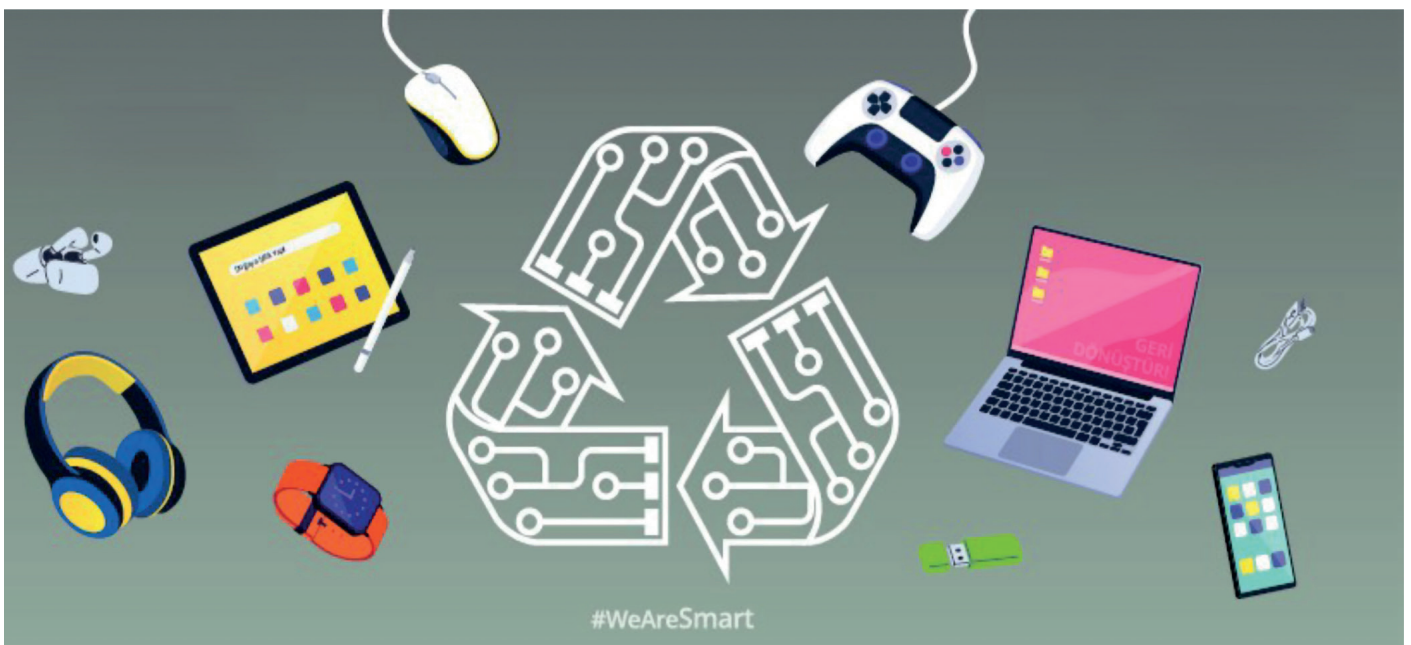
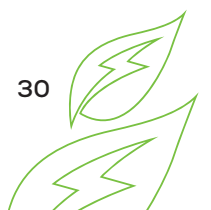


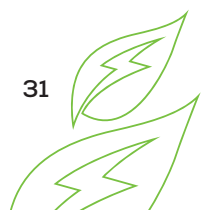
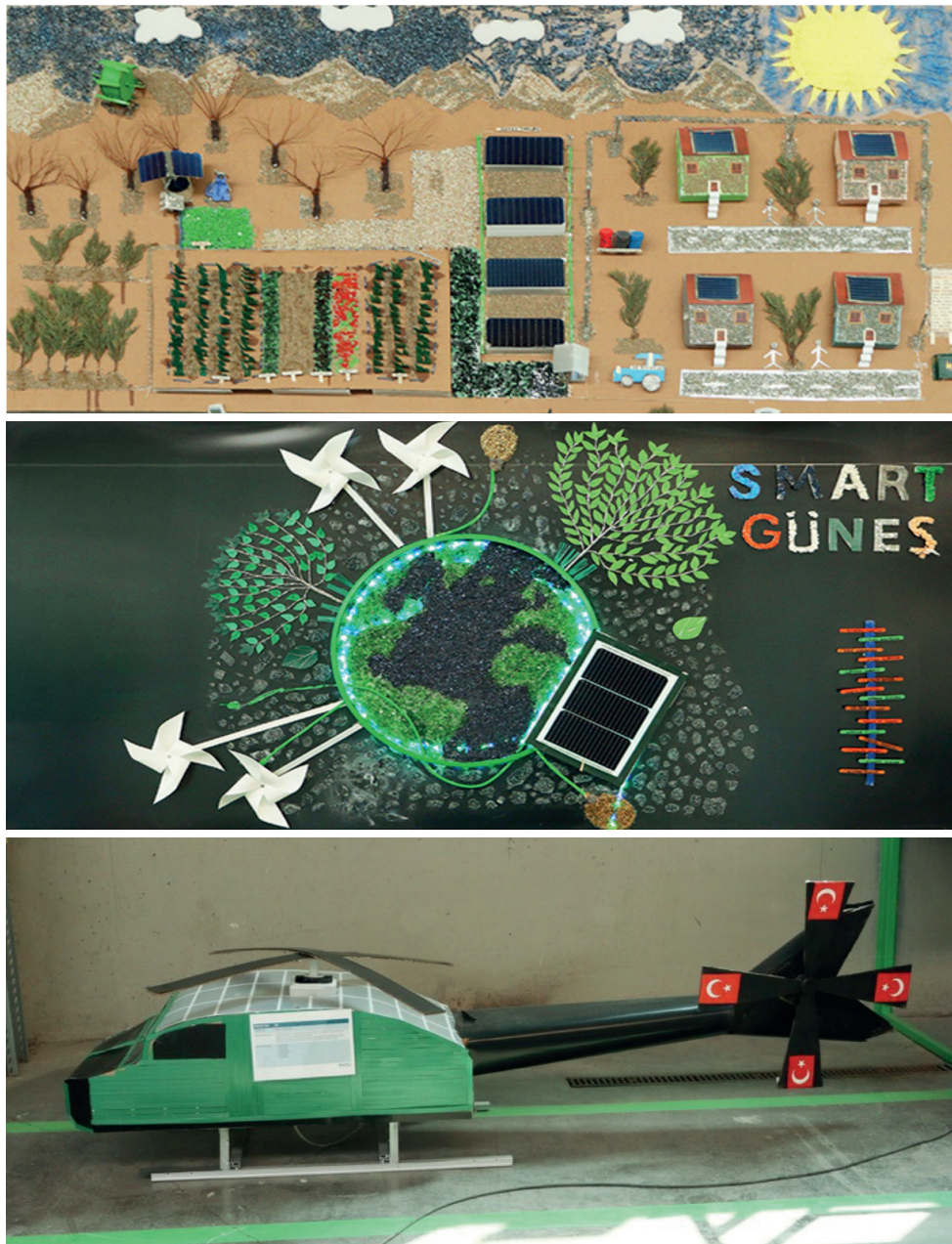
Figure 3. E-Waste Collection Campaign Poster



12.3. Environmental Awareness Raising Activities

Smart Solar Technologies organises environmental awareness raising activities throughout the year to promote responsible e-waste management and strengthen environmental awareness among employees and stakeholders. These activities may include awareness campaigns, sustainability events, World Environment Day activities, Zero Waste Week events, communication materials and educational initiatives.

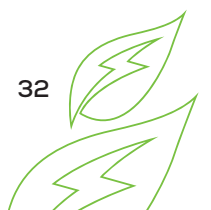
The primary objective of these activities is to encourage responsible behaviour, improve environmental performance and foster a culture of sustainability throughout the organisation.



13. CONTINUOUS IMPROVEMENT STRATEGY

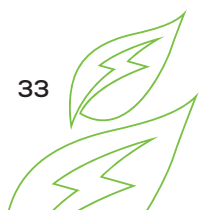
Smart Solar Technologies is committed to the continual improvement of its e-waste management practices in line with the principles of ISO 14001:2015, the circular economy and applicable legal requirements. Improvement opportunities are regularly evaluated through performance monitoring, management reviews, internal audits and stakeholder feedback.

- Monitoring technological developments and best practices
- Improving applications and processes based on stakeholder feedback
- Conducting periodic management reviews
- Promoting waste prevention, minimisation and reuse
- Enhancing the effectiveness of e-waste collection systems
- Reducing hazardous substance content where technically feasible
- Monitoring supplier and producer responsibility obligations
- Maintaining and continuously improving employee training and awareness programmes
- Regularly monitoring e-waste generation through digital tracking systems
- Monitoring compliance with applicable legal requirements
- Increasing recycling and recovery rates
- Reducing final disposal rates
- Developing joint R&D projects with recycling facilities for photovoltaic panel recycling
- Implementing corrective and improvement actions based on waste analysis results



14. REVIEW OF THE PLAN

The E-Waste Management Plan is reviewed and, where necessary, updated at least annually to ensure its continued suitability, adequacy and effectiveness. The review considers changes in legal requirements, operational activities, technological developments, organisational needs, audit findings, incident records, performance indicators and stakeholder feedback. Opportunities for continual improvement are identified during the review process, and any necessary corrective or preventive actions are incorporated into the Plan.



CONTACT



HEADQUARTERS

Energy Plaza, Rüzgarlıbahçe, Feragat Sk, No: 2, 34805
Beykoz/İstanbul - Türkiye
P: + 90 216 225 72 00
F: + 90 850 305 06 10



GEBZE SOLAR MODULE FACTORY

Gebze OSB, Tembelova Alanı, Cadde 3200, No: 3207
Gebze/Kocaeli - Türkiye
P: + 90 262 673 7100
F: + 90 262 673 7103



ALİAĞA INTEGRATED FACTORY

Aliaga OSB, Çoraklar Mah., 5024. Sokak, No: 10
Aliaga/İzmir - Türkiye
P: + 90 232 570 53 00
F: + 90 850 305 06 10

USA OFFICE

2513 Shallowford Rd Ste 200, Marietta, GA, 30066, USA

BULGARIA OFFICE

57 Cherni Vrah Blv.FI 11 Energy Tower, Sofio, Bulgaria

GERMANY OFFICE

Lerchenweg 3, 40789 Monheim am Rhein, Germany

GREECE OFFICE

Riga Fereou 3, 55134, Thessaloniki, Greece

NETHERLANDS OFFICE

Rembrandt Tower, Amstelplein 1 Postcode, Plaats: 1096 HA Amsterdam - Netherlands

ROMANIA OFFICE

30 Alexandru Puskin Street, Sector 1, Bucharest, Romania

SWITZERLAND OFFICE

Maggi Strasse 16, 8046 Zürich, Switzerland

UKRAINE OFFICE

Harmatna Str. 4, Office 3, 03067, Kyiv, Ukraine

SPAIN OFFICE

C/Alberto Alcocer 28/AI, 28036, Madrid, Spain