

Cengiz Holding A.Ş.

**Corporate Social
Responsibility Policy**

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1. Objective

The objective of the Corporate Social Responsibility Policy ("**Policy**") is to determine the framework of corporate social responsibility activities carried out by Cengiz Holding A.Ş. and its Group Companies ("**Cengiz Holding**", " **Holding**" or "**Group**") and to emphasize the basic principles in this regard.

2. Definitions

If the terms, words, and expressions used in the policy have not been defined under this title, their meanings shall be taken from the applicable laws, regulations and sectoral meanings.

Corporate Social Responsibility: These are the activities carried out by Cengiz Holding for the benefit of the society.

Extraordinary situation: Shall refer to unplanned, unexpected, or discontinuous situations.

Third Party: Shall refer to the supplier, contractor, subcontractor, dealer, distributor, broker or all representatives and consultants acting on behalf and on account of the Holding.

3. General Principles

While Cengiz Holding has been working with a dedicated social awareness since its establishment, it emphasizes social responsibility projects that consider the social values and requirements in areas such as education, sports, health, and culture under the umbrella of Şaban Cengiz Foundation, Mehmet Cengiz Foundation, and the Holding. These projects, which are brought to our country with the fundamental value of "being beneficial to the society" of the Cengiz Family from generation to generation, have been shaped by considering the needs of the people in the cities, districts, or villages where the Holding makes investments.

Cengiz Holding conducts corporate social responsibility activities by evaluating ethical, institutional, environmental, and social risks and by investing in areas such as education and sports by building structures such as schools, dormitories, and police stations in order to meet the needs of the society in cooperation with public or private institutions. One of the primary objectives of Cengiz Holding is to create a positive and sustainable impact on the society with activities that contribute to social development and support economic development, such as supporting the development of students by carrying out projects in the field of education and providing job opportunities to people living in the field of activity.

Cengiz Holding considers the following criteria when carrying out its Corporate Social Responsibility activities:

- Compliance with local and international legislation,
- Compliance with Cengiz Holding Ethical Principles Guide and the Holding policies,
- Focusing on the needs in the invested regions and the development of the society,

It is essential to start the process by conducting Due Diligence¹⁵ studies to ensure that Corporate Social Responsibility activities are carried out for trusted parties or with trusted stakeholders.

4. Corporate Social Responsibility

Cengiz Holding's Corporate Social Responsibility activities focus on the following fields:

Education

Cengiz Holding builds educational institutions to support education in the regions where it operates, to ensure equality in education and to encourage education at various levels. It provides financial support to those in need and students who have achieved success in the field of education to continue their education.

Environment

Cengiz Holding takes care to protect the environment by evaluating environmental risks while carrying out its activities. It carries out its activities by paying attention to the protection of natural resources and minimizing wastes. In this context, Cengiz Holding performs the following activities:

- afforestation of closed mining sites,
- reducing oscillation of gas,
- planting trees to reduce the negative effects of greenhouse gases,
- supporting technology investments aimed at providing a minimum impact on the environment,
- natural gas conversion to prevent harmful substances from damaging the environment.

Health and Sports

Aiming to provide benefit to the society in which it is located, Cengiz Holding builds health institutions and establishes sports facilities to encourage and develop sports activities.

Culture and History

Cengiz Holding establishes a cultural center with theaters and conference halls in order to support culture and art in the regions where it operates and to provide a working environment for artists and carries out various renovations in cooperation with the Ministry of Culture by protecting historical values.

¹⁵Detailed information on the due diligence process is provided in the *Cengiz Holding Policy on the Prevention of Laundering Proceeds of Crime*.

5. Relations with Stakeholders

Cengiz Holding comes together with its stakeholders such as other private sector organizations, non-governmental organizations, public administration, and universities on common platforms and carries out various collaborations.

Suppliers

Cengiz Holding expects all its suppliers to comply with the following in order to establish a socially responsible and ethical supply chain:

- Cengiz Holding Ethical Principles Guide,
- Laws and regulations in force in the countries where the Holding operates,
- Holding policies and procedures,
- Anti-Monopoly Practices,
- Human rights conventions,
- Legal regulations regulating working conditions (working hours, dismissal practices, benefits provided to employees, etc.) and International Labor Organization conventions,
- Anti-child labor and anti-forced labor,
- Occupational Health and Safety Practices,
- Environmental protection,
- Fundamental human rights,
- Suppliers to establish a sustainable procurement policy for their suppliers.

Customers

Cengiz Holding always exhibits an honest and respectful approach towards its existing and potential customers. The Holding pays attention to the following issues in its relations with its customers:

- Providing accurate and complete information to the customers about the features and qualities of the products and services before concluding an agreement with the customers,
- Not to compromise on the quality of products and services,
- To assess and evaluate customer satisfaction throughout the business relationship,
- To protect customer privacy,
- To evaluate and resolve customer demands in the shortest time possible.

Employees

Cengiz Holding, respecting human rights in every field it operates, creates a fair working environment for its employees based on trust, where there is no discrimination, child labor and forced labor, and where all employees have equal opportunities and rights. The Holding has zero tolerance against practices such as discrimination, intimidation, or harassment.

Cengiz Holding aims to provide this working environment by following the below practices:

- To encourage employees to volunteer in social responsibility studies,
- To inform the employees about how to minimize the environmental footprint,
- To increase the number of women in the top management positions of companies,
- Conducting a prioritization analysis to identify priority issues (economic, environmental, or social) for the Group,
- Providing training to employees on the principles of business ethics and basic legal regulations.

Government Officials and Governmental Institutions

Cengiz Holding can cooperate with state authorities and state institutions while achieving its Corporate Social Responsibility objectives. In this cooperation process, the Holding policies should be followed to prevent situations contrary to the laws and regulations such as bribery and corruption and not to cause misunderstandings.

Non-Governmental Organizations and International Organizations

Cengiz Holding supports non-governmental organizations and international organizations and carries out projects together to ensure the development of the society and increase the level of welfare.

6. Application Principles

The Corporate Social Responsibility activities to be carried out can be determined by the Corporate Communication Department considering the needs of the geography and society where Cengiz Holding operates or can be implemented in line with the demands of individuals or institutions. Before these projects have been implemented, the projects will be shared with the Board of Directors by conducting due diligence studies and performing the necessary researches. Subsequent to the approval of the Board of Directors, relevant activities will be carried out.

The social responsibility activities and processes carried out must be documented in a clear, detailed, and understandable manner and recorded for review by the Corporate Communications Department when necessary. When the Corporate Social Responsibility activity ends, the outputs should be reported to the Board of Directors.

7. Authorities and Responsibilities

All Cengiz Holding employees shall be obliged to comply with this Policy and if they witness a situation contradicting the rules mentioned in the Policy, the situation must be forthwith reported to the

- Corporate Communications or
- Legal

departments.

The Corporate Communications and Legal Departments shall be responsible for communicating the requirements of this Policy to the employees and creating an internal control environment where the employees act in accordance with the Policy.

If the legal regulations under this Policy in the countries where Cengiz Holding operates are stricter than those of the Policy, the relevant legal regulations should be considered.

If the policy is not abided by, employees may face various disciplinary penalties, which may include termination of employment.

8. Revision History

This Policy has been approved and entered into force with the relevant Board of Directors Decision of the Company and it will be the joint responsibility of the Corporate Communications and Legal Departments to periodically update the Policy in line with the changing legislation and Group processes.

| Revision | Date | Description |
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