

Cengiz Holding A.Ş.

**Social Media and
Communication
Policy**

Table of Contents

- 1. Objective and Scope.....2
- 2. Definitions2
- 3. General Principles.....2
- 4. Social Media and Communication.....3
- 5. Authorities and Responsibilities.....4
- 6. Revision History.....5

1. Objective and Scope

The objective of the Social Media and Communication Policy ("**Policy**") is to provide guidance to Cengiz Holding A.Ş. and its Group Companies ("**Cengiz Holding**", "**Holding**" or "**Group**") and its employees in order to determine the criteria to be considered when using and communicating over social media and to ensure that all employees and third parties acting on behalf of the Holding are aware of their responsibilities regarding their behavior while using the social media. In this respect, the Policy sets minimum standards for the Holding and its stakeholders.

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.

Communication: Establishing a mutually integral, fair and lawful written or verbal dialogue.

Post: These are visual, written and audio messages published on behalf of Cengiz Holding through personal or Holding's social media accounts.

Social media: It includes platforms such as Twitter, Facebook, Instagram, which are used to publish and share online content.

Company spokesperson: The person who has the right to speak on behalf of Cengiz Holding.

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

Cengiz Holding is aware of the significance of social media as a means of communication in today's world. When social media is used consciously, it provides an effective way to develop new goals, share information and perspectives, to inform the society about Cengiz Holding as well as be informed about the new trends and issues.

In addition to the many benefits that can be obtained from the correct use of social media, many important risks may as well be encountered due to social media. Examples of such risks include disclosure of confidential information and intellectual property, loss of reputation, and claims for damages. For this reason, it is very important to always act in accordance with ethical rules and legal regulations when sharing posts from both the individual accounts of the employees and the corporate accounts of the Holding.

The following are the points to be considered when using social media and communication tools:

- Attention should be paid to the language and expressions used. Unclear expressions that may cause misunderstandings should be avoided. In particular, it should be taken into consideration that the explanations made in written form are permanent, and explanations that will not harm the reputation, plans and objectives of the Holding should be made.

- Verbal or written posts should not be shared to discriminate religion, language, race, gender, etc., insult, threaten or humiliate the other party.
- Confidential information specific to the Holding or personal/commercial information of employees and third parties should not be included.
- Company e-mail addresses should not be used for social media subscriptions. Passwords and access codes should not be shared verbally or in written form. It is also necessary to pay attention to the requirements of the Policy on the Confidentiality of Information when using social media.
- A company spokesperson should be designated to provide information to the public on behalf of Cengiz Holding through the press or any media organs. Unauthorized persons shall be prohibited from making statements on behalf of the company.

4. Social Media and Communication

Corporate Social Media and Communication Activities

The use of social media supports establishing contacts with customers, raising awareness and consciousness about the Group, and informing the public about commercial activities and corporate social responsibility activities. The following behaviors should be considered when using corporate social media accounts:

- All communications on social media being accurate and in accordance with the laws, regulations, Cengiz Holding Ethical Principles, and policies,
- Ensuring that the information shared is not confidential,
- The visuals, information or personal information of others not being used without consent within the scope of regulations such as the General Data Protection Regulation ("GDPR") and the Law on the Protection of Personal Data ("LPPD"),
- The persons authorized to share on behalf of the Holding having received training on social media communications and on related laws and regulations,
- Showing equal respect for all individuals, cultures, religions, ethnicities, sexual orientation, and political views,
- Responding to the questions over the media only through the persons determined by the Holding,
- Avoiding to share any posts that would damage the reputation of the Holding.

Access to social media platforms, passwords of the accounts and posting authorizations should only be granted to certain persons. When the relevant employees leave the job or change departments, their access to Cengiz Holding's social media accounts should be removed.

Use of Individual Social Media Account by the Employees

Employees shall be prohibited from sharing visual, audial, or written posts on their personal social media accounts that will damage the reputation of Cengiz Holding, that contain information about the Holding and violate the Holding policies. Such sharing may result in disciplinary action or termination of employment contracts.

When a comment, question, or suggestion about Cengiz Holding is displayed on social media, Cengiz Holding employees and third parties should not respond to these issues and notify the Corporate Communications Department. Employees should also report this situation to the Corporate Communications Department when they encounter a post that they think is contrary to the reputation of the Holding.

When using individual social media accounts, employees should pay attention to the following behaviors:

- Avoiding situations where posts can be perceived as Holding opinions instead of individual views,
- Not underestimating the competitors,
- Not to download applications and files of unknown source to Holding's devices, not to allow applications to access contact lists or calendars to protect the privacy and personal security of the employees, customers and third parties,
- To take utmost care not to share any information even during a "private" conversation about the non-public finances or activities of the Holding,
- Not spending too much time on personal social media accounts during working hours,
- Not to open a private social media account using the name of Holding,
- Not to use the Holding logos on any social media platform without obtaining prior consent,
- Creating strong passwords when using a social media account and not sharing passwords with anyone,
- Not to access any unsecure connections.

5. 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.

Measures should be taken by the IT Department to prevent security breaches of official accounts.

Cengiz Holding employees shall be responsible for the posts they share and the communication they establish in their personal accounts related to the company. When a possible crime occurs, the relevant person shall be held responsible, not the Company.

This Policy should be updated when there are changes or renewals to local and national laws and regulations. If not updated, more stringent rules should be considered. Employees should be provided with training and information on the use of social media and communication on a regular basis in accordance with the changing laws and regulations.

If the posts shared from official or personal accounts violate this Policy or are contrary to the corporate identity of Cengiz Holding, employees may face various disciplinary penalties that may include termination of employment contract.

6. 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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