



DUYGU CONTRACTING AND CONSTRUCTION INC.

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Corporate Social Responsibility Policy

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1. Purpose and Scope

This Corporate Social Responsibility Policy (the “Policy”) establishes the principles and rules adopted by Duygu Contracting and Construction Inc. and all group companies affiliated with and/or related to the controlling shareholders of this company in order to fulfil their responsibilities toward society and stakeholders in all geographies in which they operate.

The purposes of this Policy are to:

- i) plan, implement and sustain social responsibility activities that add value to society;
- ii) ensure that the Company’s activities comply with national and international standards and legislation;
- iii) establish ethical, transparent and accountable relationships with all stakeholders, including employees, business partners, suppliers and society;
- iv) contribute to social, environmental and economic development; and
- v) support the Company’s sustainability strategy by developing projects aligned with social expectations and needs.

This Policy applies to:

- i) all Duygu Construction employees, managers and Group Companies;
- ii) projects, donations and sponsorships supported by the Company as part of its social responsibility activities; and
- iii) engagement processes with business partners, suppliers and society.

2. Definitions

Terms, words and expressions used in the Policy that are not otherwise defined under this heading shall have the meanings assigned to them under applicable legislation, relevant regulations and industry practice.

Duygu Construction: Refers collectively to Duygu Contracting and Construction Inc. and all group companies affiliated with and/or related to the controlling shareholders of this company. All such companies are collectively referred to as “Duygu Construction” under this Policy.

Stakeholder: Any person, institution or organisation affected by or capable of affecting Duygu Construction’s activities, including employees, business partners, suppliers, public authorities, civil society organisations, local communities and customers.

Stakeholder Engagement: The process of maintaining regular, transparent and constructive communication with stakeholders, receiving and evaluating their views, suggestions and complaints, and reflecting them in decision-making.

Social Project: An activity planned and implemented to provide social benefit in fields such as education, health, the environment, culture, sport and social inclusion.

Corporate Social Responsibility: Activities carried out by Duygu Construction for the benefit of society.

Extraordinary Situation: A situation that is unplanned, unexpected or non-recurring.

Grievance and Feedback Mechanism: Secure and confidential communication channels through which employees, business partners and members of society may report matters they consider contrary to ethical principles or legislation.

Sustainability: Meeting present needs by balancing environmental, social and economic factors without compromising the ability of future generations to meet their own needs.

Third Party: Any supplier, contractor, subcontractor, dealer, distributor, intermediary, representative or consultant acting in the name and on behalf of the Company.

3. General Principles

Since its establishment, Duygu Construction has acted with a strong sense of social responsibility and has carefully developed social responsibility projects that reflect social values and needs in areas such as education, sport, health and culture. Guided by the Duygu Family's intergenerational core value of "being useful to society", these projects are shaped by the needs of people in the cities, districts and villages where the Company invests.

By assessing ethical, corporate, environmental and social risks, Duygu Construction cooperates with public and private institutions to build schools, dormitories, police stations and similar facilities in the regions where it operates, and invests in education and sport as part of its corporate social responsibility activities. Creating a positive and sustainable impact through projects that support students' development, provide employment opportunities to local people, contribute to social progress and support economic development is among Duygu Construction's priorities.

Duygu Construction considers the following criteria when carrying out Corporate Social Responsibility activities:

Compliance with Legislation and International Standards: All activities are conducted in accordance with applicable national legislation, international standards, the Company's Code of Ethics and policies.

Social Benefit and Needs Orientation: Projects are shaped according to priority needs identified through stakeholder consultations and due-diligence studies in the regions of operation.

Respect for Human Rights: No social responsibility project may be planned or implemented in a manner that directly or indirectly causes human-rights violations.

Environmental Sustainability: Projects contribute to protecting natural resources and reducing environmental impacts.

Transparency and Accountability: All projects are conducted openly and in a manner that can be documented and reported, and are shared regularly with relevant parties.

Stakeholder Engagement: The impact of projects is increased by obtaining the views of local communities, public authorities, civil society organisations and other stakeholders.

Duygu Construction carries out social responsibility activities in cooperation with reliable business partners and stakeholders. Before each project, due diligence is conducted to assess risks, potential social and environmental impacts and the project's sustainable contribution.

4. Corporate Social Responsibility

Duygu Construction's Corporate Social Responsibility activities focus on the following areas, taking into account society's priority needs and sustainable development objectives:

Education

Duygu Construction builds educational institutions, develops programmes supporting student development and provides scholarships and financial support to students in need or with strong academic achievement in order to increase access to education, support equality of opportunity and promote education at different levels in the regions where it operates.

Environment

Duygu Construction protects the environment by assessing environmental risks in its activities. It operates with due regard for conserving natural resources and minimising waste. In this context, Duygu Construction carries out activities such as:

- reforestation of closed mining sites;
- support for investments that reduce greenhouse-gas emissions;
- use of technologies with minimal environmental impact; and
- implementation of transformation projects intended to reduce the effects of harmful substances.

Health and Sport

Healthcare institutions are built, sports facilities are established and projects promoting participation in sport are supported in order to improve public health and quality of life.

Culture and History

Duygu Construction supports culture and art in the regions where it operates, provides working environments for artists and establishes cultural centres containing theatres and conference halls. It also carries out renovation projects in cooperation with the Ministry of Culture to contribute to the protection of historical assets.

Social Inclusion

The Company prioritises projects that support disadvantaged groups, strengthen social equality and promote the development of local communities.

5. Relations with Stakeholders

Duygu Construction aims to establish transparent, ethical and sustainable relationships with stakeholders in all geographies where it operates. The Company develops regular consultation mechanisms, carries out partnerships and reflects feedback in decision-making processes together with other private-sector organisations, civil society organisations, public administrations, international organisations, academic institutions and local-community representatives.

Duygu Construction aims to make its relationships with all stakeholders sustainable within the framework of transparency and accountability.

Suppliers

To establish a socially responsible and ethical supply chain, Duygu Construction expects all suppliers to comply with:

- the Duygu Construction Code of Ethics and Company policies;
- laws and regulations applicable in the countries of operation;
- anti-monopoly and competition requirements;
- human-rights conventions and International Labour Organization (ILO) Standards;
- the prohibition of child labour and forced labour;
- occupational health and safety practices;
- environmental protection and sustainability principles;
- fundamental human rights; and
- equivalent standards throughout their own subcontractor and sub-supplier chains.

Suppliers are required to commit to these principles, and regular audit and monitoring processes are conducted. Corrective action is requested where violations are identified; repeated or serious violations may result in termination of the business relationship.

Customers

Duygu Construction bases its relationships with current and prospective customers on integrity, transparency and mutual trust. Accordingly, the following principles apply:

- providing accurate and complete information about products and services;
- not compromising product and service quality;
- regularly measuring and evaluating customer satisfaction;
- protecting customer confidentiality; and
- receiving complaints and feedback transparently and resolving them promptly.

Employees

Duygu Construction respects human rights in all areas in which it operates and creates a fair, trust-based workplace free from discrimination, child labour and forced labour, in which all employees have equal opportunities and rights. The Company has zero tolerance for discrimination, intimidation and harassment.

Duygu Construction seeks to create this working environment through the following practices:

- encouraging employees to participate voluntarily in social responsibility activities;
- informing employees about how to minimise environmental footprints;
- increasing the number of women in the senior management of Group Companies;
- conducting a materiality analysis to identify the Group's priority economic, environmental and social issues;
- providing mechanisms such as the Ethics Line through which employees can safely communicate grievances and concerns;
- respecting trade-union and collective-bargaining rights; and
- providing regular training on occupational health and safety and environmental awareness.

Public Officials and Institutions

Duygu Construction may cooperate with public officials and institutions in achieving its Corporate Social Responsibility objectives. The following principles apply to such cooperation:

- no bribery, corruption or unlawful activity is permitted;
- transparency and accountability are fundamental in all cooperation processes; and
- processes are recorded to ensure auditability.

Civil Society and International Organisations

The Company cooperates with national and international civil society organisations, develops joint projects and contributes to sustainable development objectives in order to support social progress. Such cooperation is conducted in accordance with national and international legislation and standards.

6. Implementation Principles

Corporate Social Responsibility activities may be planned by the Human Resources Department according to the priorities of the regions in which Duygu Construction operates and the needs of society, or implemented in response to stakeholder requests. Before any project is implemented, comprehensive due diligence is completed through consultation with local communities, public institutions and relevant stakeholders. The resulting report is submitted to the Board of Directors, and the project is implemented only after Board approval.

Social responsibility activities and processes must be documented clearly, fully and understandably and retained by the Human Resources Department for review when required. On completion, results and impact assessments must be reported to the Board of Directors and, where appropriate, disclosed transparently to the public and stakeholders.

7. Authority and Responsibilities

All Duygu Construction employees must comply with this Policy. Where a situation conflicting with the rules set out in the Policy is witnessed, it must be reported without delay to:

- the Ethics and Compliance Committee;
- the Human Resources Department;
- the Legal Department; and
- where relevant to the subject matter, other appropriate departments such as Purchasing or Finance.

The Ethics and Compliance Committee is responsible for communicating the requirements of this Policy to employees and establishing an internal control environment demonstrating that employees act in accordance with the Policy.

The Human Resources Department is also responsible for informing employees about this Policy through regular training and awareness activities and providing guidance on implementation.

Where the laws applicable in countries in which Duygu Construction operates are stricter than this Policy, the applicable legal requirements shall prevail.

Employees who fail to comply with the Policy may be subject to various disciplinary sanctions, including termination of employment.

8. Revision History

This Policy has entered into force following approval by the Ethics and Compliance Committee pursuant to the relevant resolution of the Company's Board of Directors. The Ethics and Compliance Committee is responsible for reviewing the Policy at least annually in parallel with changes in legislation and international standards and updating it where necessary.