



DUYGU CONTRACTING AND CONSTRUCTION INC.

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Records Retention Policy

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1. Purpose and Scope

The Records Retention Policy (the “Policy”) has been prepared to establish the rules governing the retention, protection, access to and, where necessary, destruction of physical documents and digital records kept by Duygu Contracting and Construction Inc. and all group companies affiliated with and/or related to the controlling shareholders of this company and containing information relating to customers, personnel, business partners and all other third parties.

This Policy applies to:

- all Duygu Construction employees, managers and Group Companies;
- all types of records used in business processes, including written, printed, electronic, audio and visual records; and
- records shared with or obtained from the Company’s suppliers, business partners and consultants.

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.

Personal Data: Any information relating to an identified or identifiable natural person.

Record: All written, printed, electronic, audio or visual information and documents created, received or retained in connection with Company activities.

Electronic Record: Any record stored in digital form, including but not limited to servers, e-mail systems, invoicing systems, camera recordings and mobile devices.

Physical Record: Records held on portable physical media such as files, folders, notebooks, written documents, magnetic tapes, CDs/DVDs, USB drives and external hard disks.

Recording Medium: Any medium containing personal data processed wholly or partly by automated means or by non-automated means forming part of a data filing system.

Retention Period: The period for which records must be kept in accordance with legal, administrative and contractual obligations or business requirements.

Destruction: The irreversible deletion, destruction or anonymisation of records whose retention period has expired or that are no longer required.

Legislation: All applicable regulations concerning the protection of personal data in Türkiye and in countries and regions where the Company operates, including in particular Personal Data Protection Law No. 6698.

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

Records relating to employees, job applicants, customers, visitors and Third Parties are retained by Duygu Construction in accordance with applicable legislation and securely destroyed when their retention periods expire.

This Policy applies to the following categories of records, among others:

- physical or digital documents containing personal information;
- contracts with employees, customers and all third parties;
- documents containing meeting materials and minutes of the Board of Directors and management committees of Group Companies;
- documents constituting trade secrets;
- documents relating to sales and marketing processes;
- accounting records, expense documents, invoices, receipts and bank slips;
- employee and applicant records relating to human resources processes;
- e-mails and internal Company correspondence; and
- portable storage devices.

4. Implementation Principles

All information and documents obtained in connection with Company activities must be retained in a manner that preserves their confidentiality and authenticity. Records may be held in physical or digital form.

Duygu Construction takes the measures necessary to ensure that all recorded information and documents are securely retained. The units that create and/or obtain physical information and documents as part of their duties are responsible for their proper preservation. The physical conditions of archive areas must be monitored and precautions taken against fire, flooding and similar risks. Access to archives must be monitored by the Information Technology (IT) Unit, and only authorised personnel may enter archive areas.

The IT Unit is responsible for the security of records held in digital form. Measures must be taken to prevent system failures and, where necessary, digitally recorded information and documents must also be stored in a cloud environment outside Company systems. Contracts with cloud service providers must expressly require compliance with confidentiality principles.

Duygu Construction processes personal data in accordance with local and international legislation. Further details are provided in the Duygu Construction Information Confidentiality Policy.

4.1 Classification of Records

Classification of records plays an important role in maintaining confidentiality. Records are classified according to their confidentiality level as “public”, “internal document”, “confidential” and “special category personal data”. Special categories of personal data, such as health and biometric data, are processed only with explicit consent or under exceptions provided by law and are retained using the highest security measures.

Public records are records whose disclosure outside the Company would not adversely affect Duygu Construction. Information in such documents does not breach personal data protection

legislation or endanger the Company's reputation. Newspapers, websites, brochures, leaflets and published market research are included in this category.

Records classified as internal documents include almost all documents relating to Company activities. Unauthorised disclosure may create reputational risk for the Company. Such documents may be shared only where necessary for the conduct of activities and with senior management approval. Office documents, employee information, travel information, policies and procedures and presentations are included in this category.

Confidential records contain commercial information relating to Company activities. They require a high level of care, restricted access and special controls; unauthorised publication may be unlawful. Such records may be shared with employees and/or third parties only where access is required and to a reasonable extent consistent with the purpose. Third-party due diligence files, committee reports, employee personal information, internal financial and commercial documents and customer information are included in this category.

4.2 Retention of Records

Duygu Construction retains all information and documents obtained in the course of its activities for at least the periods prescribed by law and, where not contrary to law, for longer periods. Records whose retention period has expired must be deleted or destroyed. Where legislation does not prescribe a maximum retention period, each unit may determine an appropriate retention period.

Retention periods are determined by taking the following matters into account:

- the period required for the relevant data category;
- the duration of the legal relationship;
- the duration of Duygu Construction's legitimate interest in light of the purpose for which the relevant data are processed;
- the legal risks, costs and liabilities arising from retaining the relevant data; and
- the statutory limitation period for asserting claims relating to the data.

Records are archived in groups according to date or category. Access to all physical and digital archives must be restricted to authorised persons.

Physical records may be stored at Company premises or in a supplier-operated archive, depending on need. Where a supplier archive service is used, the Purchasing Unit must conduct due diligence on the supplier; contracts must clearly regulate confidentiality, access control and data security; and archive areas must be inspected periodically. The supplier must implement adequate protection against internal and external risks such as fire, earthquake, flood, lack of ventilation and theft. The supplier's security measures must also be reviewed periodically.

4.3 Destruction of Records

All confidential and sensitive information recorded in physical or digital form is securely destroyed in accordance with applicable legislation when no longer required, when its retention period expires or upon a valid request by the relevant person.

Duygu Construction may record a substantial amount of information and documentation physically in the course of its daily activities. Secure destruction of such records is therefore important. Where the statutory retention periods for official records have expired, no special

approval process is required for destruction. Each unit is responsible for monitoring and destroying records maintained within its area of responsibility. Units must review their records at least once a year to determine which retention periods have expired. The Legal Department should be consulted where there is uncertainty about statutory periods.

Physical records are securely destroyed using paper shredders, incineration or authorised disposal companies.

For digital records, simply deleting the file from a device is not sufficient; irreversible destruction methods must be used.

The date, method and responsible unit for each destruction action must be recorded separately and retained by the relevant department.

5. 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 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 Information Technology Department is also responsible for ensuring the digital security of records, maintaining access logs and conducting regular controls.

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.

6. 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.