



DUYGU CONTRACTING AND CONSTRUCTION INC.

-

Social Media and Communications Policy

Table of Contents

1.	Purpose and Scope.....	3
2.	Definitions.....	3
3.	General Principles.....	3
4.	Social Media and Communications.....	4
5.	Authority and Responsibilities.....	5
6.	Revision History.....	6

1. Purpose and Scope

Duygu Contracting and Construction Inc. and all group companies affiliated with and/or related to the controlling shareholders of this company recognise the critical importance of social media and communication channels for corporate reputation, reliability and stakeholder relations. The purpose of this Social Media and Communications Policy (the “Policy”) is to establish the rules that employees and third parties must follow when using social media and communication tools, preserve the integrity of corporate communications, minimise reputational risks and ensure compliance with applicable national and international legislation.

The Policy applies to all corporate accounts used on behalf of Duygu Construction, employees’ personal accounts where the Company is concerned, and communication channels established with third parties. Posts made by employees through personal accounts are also covered because the public may perceive them as representing the Company’s views.

Group Companies may adopt stricter rules in light of their fields of activity and geographic conditions, but may not apply more lenient rules.

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.

Communication: Written or verbal dialogue conducted honestly, fairly and lawfully between parties.

Post: Visual, written or audio content published on behalf of Duygu Construction through personal or Company social media accounts.

Social Media: Platforms such as Twitter, Facebook, Instagram and LinkedIn, and similar digital channels used to publish and share online content.

Corporate Account: A social media or digital communications account opened and officially managed on behalf of Duygu Construction or a Group Company.

Company Spokesperson: A person authorised to speak on behalf of Duygu Construction.

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

Duygu Construction recognises that social media is a powerful communication and engagement tool. When used correctly and responsibly, it provides an effective platform for strengthening the Company’s reputation, informing the public, sharing current developments and communicating more transparently with stakeholders.

However, incorrect or careless use of social media carries risks including disclosure of confidential information, infringement of intellectual property rights, reputational damage and

legal or compensation proceedings. All posts made through employees' personal accounts and Duygu Construction's official corporate accounts must therefore comply with ethical rules, legal requirements and Company policies.

Employees must observe the following key principles when using social media and communication tools:

- Language and wording must be clear, respectful and professional; ambiguous or speculative content that may cause misunderstanding must be avoided.
- No post may discriminate on grounds such as religion, language, race, gender, age, disability or belief, or encourage violence, insults or harassment.
- Confidential information specific to Duygu Construction, trade secrets and personal or commercial data belonging to employees or third parties must not be shared.
- Company e-mail addresses must not be used for personal registration or membership on social media platforms.
- Passwords or access information for social media accounts must never be shared with third parties, and the requirements of the Information Confidentiality Policy must also be applied diligently to social media use.
- Statements to the media or the public on behalf of Duygu Construction may be made only by Company spokespersons. Unauthorised employees are prohibited from expressing views on behalf of the Company.

4. Social Media and Communications

Corporate Social Media and Communication Activities

Use of social media helps connect with customers, increase awareness of Duygu Construction and inform the public about commercial activities and corporate social responsibility projects. Such activities must be conducted carefully so that they do not harm Duygu Construction's reputation.

The following principles apply to corporate social media accounts:

- All communications must be accurate, transparent, ethical and compliant with applicable law, the Duygu Construction Code of Ethics and relevant policies.
- It must be confirmed that information to be shared is not confidential or a trade secret.
- Images, information or personal data belonging to others may be used only with the permission of the relevant person or organisation and in accordance with GDPR and KVKK requirements.
- Persons authorised to post on behalf of Duygu Construction must receive the necessary training. Unauthorised persons are strictly prohibited from posting through official accounts.
- All individuals, cultures, beliefs, ethnic backgrounds, sexual orientations and political views must be treated with respect.
- Questions from the media or public may be answered only through authorised Company spokespersons.

- Account access, passwords and posting permissions must be restricted to the relevant employees, and access rights must be removed immediately when an employee leaves the Company or changes duties.

Employees' Personal Use of Social Media

Employees are prohibited from posting visual, audio or written content through personal social media accounts that damages Duygu Construction's reputation, contains Company information or breaches Company policies. Such conduct may result in disciplinary sanctions or termination of employment.

Employees who encounter a comment, question or suggestion concerning Duygu Construction on social media must not respond and must notify the Human Resources Department. The same procedure applies where any post that may damage the Company's reputation is identified.

Employees must observe the following requirements when using personal social media accounts:

- Avoid wording that may be perceived as expressing Duygu Construction's views.
- Do not post disparaging or insulting content about competitors or content that breaches competition rules.
- Do not download applications of unknown origin to Company devices or permit access that may put the privacy of employees, customers or third parties at risk.
- Never share non-public financial information or strategic plans of the Company.
- Do not spend excessive time on personal social media accounts during working hours.
- Do not use the Company name or logo on personal social media accounts without specific permission.
- Use strong passwords and do not share them with anyone.
- Do not interact with untrusted links or content.

5. Authority and Responsibilities

All Duygu Construction employees must comply with this Policy. If employees encounter conduct contrary to the rules set out in the Policy, they must report it without delay through at least one of the following channels:

- Ethics and Compliance Committee
- Human Resources Department
- Legal Department

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 must take the measures necessary to prevent security breaches of official accounts.

Duygu Construction employees are responsible for posts and communications concerning the Company made through their personal accounts. In the event of a potential offence, the relevant individual, rather than the Company, shall be responsible.

This Policy shall be updated when local or national laws and regulations change. If the Policy has not yet been updated, the stricter rule shall apply.

Employees shall receive regular training and information on social media use and communication in line with changes in law and regulation.

Where posts made through official or personal accounts breach this Policy or are contrary to Duygu Construction's corporate identity, employees 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.