



**Cengiz Holding A.Ş.**  
**Corporate Social Responsibility**  
**Policy**

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## 1. Purpose and Scope

This Corporate Social Responsibility Policy (“Policy”) sets out the principles and rules adopted by Cengiz Holding Inc. and its Group Companies (“Cengiz Holding”, “Holding” or “Group”) to fulfil their responsibilities towards society and stakeholders in all geographies where they operate.

The purpose of this Policy is to:

- i) Plan, implement, and sustain social responsibility activities that will create value for society,
- ii) Ensure that the Holding’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,
- v) Support the Holding’s sustainability strategy by developing projects in line with societal expectations and needs.

This Policy applies to:

- i) All Cengiz Holding employees, managers, and Group Companies,
- ii) Projects, supported by the Group within the scope of social responsibility, as well as donation and sponsorship activities,
- iii) Interaction processes with business partners, suppliers, and society.

## 2. Definitions

Unless otherwise defined under this section, the terms, words, and expressions used in the Policy shall take their meaning from applicable laws, regulations, and sectoral usage.

**Stakeholder:** Refers to all individuals, institutions, and organisations affected by or able to influence Cengiz Holding’s activities (including employees, business partners, suppliers, public authorities, non-governmental organisations, local communities, and customers).

**Stakeholder Engagement:** Refers to the process of establishing regular, transparent, and constructive communication with stakeholders to gather, assess, and reflect their views, suggestions, and complaints in decision-making processes.

**Social Project:** Refers to activities planned and carried out in fields such as education, health, environment, culture, sports, and social inclusion with the aim of creating social benefit.

**Corporate Social Responsibility:** Refers to activities carried out by Cengiz Holding for the benefit of society.

**Extraordinary Situation:** Refers to situations that are unplanned, unexpected, or non-recurring in nature.

**Complaint and Feedback Mechanism:** Refers to secure and confidential communication channels through which employees, business partners, and society can report issues they consider to be contrary to ethical principles or legislation.

**Sustainability:** Refers to the principle of addressing environmental, social, and economic factors in a balanced manner to meet today's needs without compromising the ability of future generations to meet their own.

**Third party:** Refers to any supplier, contractor, subcontractor, dealer, distributor, intermediary, or any representative and consultant acting on behalf and account of the Holding.

### **3. General Principles**

Since its establishment, Cengiz Holding has operated with a deep sense of social responsibility, focusing through the Şaban Cengiz Foundation, the Mehmet Cengiz Foundation, and under the Holding structure on social responsibility projects in fields such as education, sports, health, and culture, taking into account societal values and needs. These projects, introduced to the country under the guiding principle of the Cengiz Family's generational value of "being beneficial to society," are shaped in line with the needs of the people in the cities, districts, or villages where the Holding invests.

By assessing ethical, corporate, environmental, and social risks, Cengiz Holding undertakes corporate social responsibility activities in cooperation with public or private institutions to address societal needs. These activities include building schools, dormitories, police stations, and similar facilities in regions where it operates, as well as investing in education and sports. Supporting students' development through educational projects and providing job opportunities to people living in the areas of operation are among the key priorities of Cengiz Holding, aiming to contribute to social development, support economic growth, and create a positive and sustainable impact on society.

When carrying out Corporate Social Responsibility activities, Cengiz Holding takes the following criteria into consideration:

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

**Focus on Social Benefit and Needs:** Projects are shaped according to priority needs identified through stakeholder consultations and due diligence studies in the regions where operations are conducted.

**Respect for Human Rights:** No social responsibility project shall be planned or implemented in a way that directly or indirectly causes human rights violations.

**Environmentally Sustainable:** Projects contribute to the protection of natural resources and the reduction of environmental impacts.

**Transparency and Accountability:** All projects are carried out in a transparent, documented, and reportable manner and are shared regularly with relevant parties.

**Stakeholder Engagement:** The opinions of local communities, public authorities, non-governmental organisations, and other stakeholders are taken into account to enhance the impact of projects.

Cengiz Holding carries out social responsibility activities in collaboration with reliable business partners and stakeholders. Accordingly, prior to each project, due diligence studies are conducted to assess the risks, potential social and environmental impacts, and sustainable contributions of the project.

#### **4. Corporate Social Responsibility**

Cengiz Holding's Corporate Social Responsibility (CSR) activities focus on the following areas, taking into account the priority needs of society and the Sustainable Development Goals:

##### **Education**

In the regions where it operates, Cengiz Holding builds educational institutions, develops programmes to support students' development, and provides scholarships and financial support to students in need or with outstanding performance, with the aim of increasing access to education, supporting equal opportunities, and promoting education at various levels.

##### **Environment**

In carrying out its activities, Cengiz Holding carefully evaluates environmental risks and strives to protect the environment. Operations are conducted with attention to conserving natural resources and minimising waste. In this context, Cengiz Holding undertakes initiatives such as:

- Reforestation of closed mining sites,
- Supporting investments that reduce greenhouse gas emissions,
- Using technologies that provide minimal impact on the environment,
- Implementing transformation projects to reduce the effects of harmful substances.

##### **Health and Sports**

To improve public health and quality of life, Cengiz Holding builds healthcare institutions, establishes sports facilities, and supports projects that promote the spread of sports.

##### **Culture and History**

Cengiz Holding supports culture and the arts in the regions where it operates; provides working spaces for artists, establishes cultural centres including theatres and conference halls, and carries out renovation projects in cooperation with the Ministry of Culture to contribute to the preservation of historical values.

## **Protection of Cultural Heritage**

Cengiz Holding recognizes historical and cultural assets located in the regions where it operates as the common heritage of humanity and considers their protection among its primary responsibilities. During the planning, construction, and operation phases of energy investments, it conducts Environmental and Social Impact Assessment processes in line with national legislation and IFC Performance Standard 8 to ensure the protection of tangible cultural heritage elements (e.g., archaeological sites, historical structures, monumental assets, and registered/protected areas).

Cengiz Holding takes necessary preventive measures to identify archaeological finds, historical structures, and monumental assets within its operational sites and to preserve their physical integrity; and implements a “chance find” approach—coordinated with relevant institutions—against potential finds during excavation, earthworks, and similar activities. Where deemed necessary, it seeks the opinions of qualified cultural heritage experts; supports the protection priority through an “in situ preservation” approach; and monitors the effectiveness of the measures implemented.

With the awareness that cultural heritage is not limited solely to physical elements, Cengiz Holding respects the traditions, living practices, and socio-cultural values of local communities in the regions where it operates; and, within this scope, demonstrates sensitivity towards the protection of intangible cultural heritage such as customs and traditions, folklore, oral traditions and narratives, local languages/dialects, rituals and ceremonies, festivals, cultural expressions including music and dance, as well as traditional knowledge and craftsmanship practices. During the planning and implementation stages of investments, it takes local cultural sensitivities into account through stakeholder engagement and transparent dialogue mechanisms; makes necessary adjustments to prevent or mitigate potential adverse impacts; and acts in cooperation with relevant stakeholders and competent authorities.

## **Social Inclusion**

The Holding prioritises projects aimed at supporting disadvantaged groups, strengthening social equality, and fostering the development of local communities.

## **5. Relations with Stakeholders**

Cengiz Holding aims to establish transparent, ethical, and sustainable relationships with its stakeholders in all geographies where it operates. The Holding develops regular consultation mechanisms with other private sector organisations, non-governmental organisations, public authorities, international organisations, academic institutions, and representatives of local communities; engages in cooperation; and reflects their feedback into decision-making processes.

Cengiz Holding is committed to ensuring that all relationships with stakeholders are sustainable within the principles of transparency and accountability.

## **Suppliers**

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

- Cengiz Holding Code of Ethics and company policies,
- Applicable laws and regulations in the countries of operation,
- Anti-monopoly practices,
- Human rights conventions and International Labour Organization (ILO) Standards,
- Prohibition of child labour and forced labour,
- Occupational health and safety practices,
- Environmental protection and sustainability principles,
- Fundamental human rights,
- Application of similar standards to subcontractors.

Suppliers are required to provide a commitment of compliance with these principles, and regular audit and monitoring processes are carried out. Corrective actions are demanded in the event of violations; repeated or serious violations may result in termination of the business relationship

## **Customers**

Cengiz Holding bases its relationships with current and potential customers on honesty, transparency, and mutual trust. Within this framework:

- Accurate and complete information about the features of products and services is provided,
- No compromise is made on the quality of products and services,
- Customer satisfaction is regularly measured and assessed,
- Customer confidentiality is protected,
- Complaints and feedback are received transparently and resolved promptly.

## **Employees**

Cengiz Holding respects human rights in all areas of its operations and creates a working environment for its employees that is fair, based on trust, free from all forms of discrimination, child labour, and forced labour, and in which all employees enjoy equal opportunities and rights. The Holding adopts zero tolerance towards practices such as discrimination, bullying, or harassment.

Cengiz Holding seeks to maintain this working environment by:

- Encouraging employees to participate in voluntary social responsibility activities,
- Informing employees on how to minimise environmental impact,
- Increasing the number of women in senior management positions,
- Conducting a prioritisation analysis to identify key issues (economic, environmental, or social) for the Group,

- Providing mechanisms such as the Ethics Hotline for employees to raise complaints and concerns safely,
- Respecting union and collective bargaining rights,
- Delivering regular training on occupational health and safety and environmental awareness.

### **Government Officials and Agencies**

Cengiz Holding may cooperate with government officials and state institutions in achieving its Corporate Social Responsibility objectives. In these cooperation processes, the following principles are adopted:

- No tolerance for bribery, corruption, or any unlawful activity,
- Ensuring transparency and accountability in all cooperation processes,
- Documenting all processes to ensure auditability

### **Non-Governmental Organisations and International Organisations**

To support social development, the Holding cooperates with national and international non-governmental organisations, develops joint projects, and contributes to the Sustainable Development Goals. These collaborations are carried out in compliance with national and international legislation and standards.

## **6. Implementation Principles**

Corporate Social Responsibility (CSR) activities may be planned by the Corporate Communications Department, taking into account the priorities of the regions where Cengiz Holding operates and the needs of society, or they may be implemented in response to requests from stakeholders. Before any project is implemented, a comprehensive due diligence study is conducted; this study is completed through consultations with the local community, public institutions, and relevant stakeholders. The report prepared as a result of this study is submitted to the Board of Directors, and the project is implemented following the Board's approval.

All CSR activities and processes must be documented in a clear, detailed, and understandable manner and kept on record by the Corporate Communications Department for review when necessary. Upon completion of the activities, the results and impact assessment must be reported to the Board of Directors and, where deemed necessary, disclosed transparently to the public and stakeholders

## **7. Roles and Responsibilities**

All Cengiz Holding employees are obliged to comply with this Policy. If an employee witnesses a situation that conflicts with the rules set out in the Policy, the matter must be promptly reported to:

- The Corporate Communications Department, or

- The Legal Department,
- and where necessary depending on the subject matter, to other relevant departments (e.g., Environment and Sustainability, Legal, Finance, Human Resources, etc.).

The Corporate Communications and Legal Departments are responsible for communicating the requirements of this Policy to employees and for establishing an internal control environment to ensure compliance. Depending on the nature of the activities, the Environment, Human Resources, and Finance Departments also contribute to the process.

In addition, the Corporate Communications Department is responsible for providing regular training and awareness activities to inform employees about this Policy and to offer guidance on its implementation.

In countries where Cengiz Holding operates, if legal regulations within the scope of this Policy are stricter than the provisions of the Policy, the relevant legal regulations shall prevail.

Failure to comply with the Policy may result in various disciplinary sanctions for employees, including termination of employment.

## **8. Revision History**

This Policy has been approved and enacted by the relevant Resolution of the Company’s Board of Directors, and it is the joint responsibility of the Corporate Communications and Legal Departments to update it periodically in line with changes in legal regulations and Group processes.

<b>Revision No</b>	<b>Revision Date</b>	<b>Description</b>
01	15.09.2025	Updated to strengthen alignment with applicable legislation, international standards, and company practices.
02	10.02.2026	Cultural heritage protection information added.