



# **Cengiz Holding A.Ş.**

## **Social Media and Communication Policy**

*Revision No. : 01*  
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## 1. Purpose and Scope

Cengiz Holding A.Ş. and its Group Companies (“Cengiz Holding”, “Holding” or “Group”) recognise the critical importance of social media and communication channels in terms of corporate reputation, credibility, and stakeholder relations. The purpose of this Social Media and Communication Policy (“Policy”) is to set out the rules to be followed by employees and third parties when using social media and communication tools, to safeguard corporate communication integrity, to minimise reputational risks, and to ensure compliance with applicable national and international legislation.

This Policy covers all corporate accounts used on behalf of Cengiz Holding, employees’ personal accounts (in cases where they relate to the Holding), and communication channels established with third parties. As posts shared from employees’ personal accounts may be perceived by the public as the Holding’s views, they are also subject to this Policy.

Group Companies may adopt stricter rules in line with their respective business activities and geographical conditions; however, they may not implement more lenient rules.

## 2. Definitions

Unless otherwise defined under this section, the terms, words, and expressions used in this Policy shall have the meanings ascribed to them under applicable laws, regulations, and sectoral practices.

**Communication:** Establishing mutual written or verbal dialogue that is honest, fair, and in compliance with the law.

**Sharing:** Visual, written, or audio messages published on behalf of Cengiz Holding through personal or corporate social media accounts.

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

**Corporate Account:** Social media and digital communication accounts officially created and managed on behalf of Cengiz Holding or its Group Companies.

**Company Spokesperson:** A person authorised to speak on behalf of Cengiz Holding.

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

## 3. General Principles

Cengiz Holding recognises that social media is a powerful tool for communication and interaction in today’s world. When used correctly and responsibly, social media serves as an effective platform to strengthen the Company’s reputation, inform the public, share current developments, and engage with stakeholders in a transparent manner.

However, improper or careless use of social media carries risks such as the disclosure of confidential information, infringement of intellectual property rights, reputational damage, or potential legal and compensation processes. Therefore, all postings made both on employees’

personal accounts and on Cengiz Holding's official corporate accounts must comply with ethical standards, legal regulations, and Holding policies.

The following key principles must be observed by employees when using social media and communication tools:

- The language and expressions used must be clear, respectful, and professional; ambiguous, speculative, or misleading content that may result in misunderstanding should be avoided.
- No posts may contain discriminatory content on the basis of religion, language, race, gender, age, disability, or belief, nor promote violence, insult, or harassment.
- Confidential information specific to Cengiz Holding, trade secrets, or personal/commercial data relating to employees or third parties must not be shared.
- Holding e-mail addresses must not be used for personal memberships or registrations on social media platforms.
- Passwords or access details for social media accounts must never be shared with third parties, and the requirements of the Information Confidentiality Policy must be strictly observed in the use of social media.
- Statements to the media or public on behalf of Cengiz Holding may only be made by the authorised company spokespersons. Employees without such authorisation are prohibited from expressing views on behalf of the Company.

#### **4. Social Media and Communication**

##### **Corporate Social Media and Communication Activities**

The use of social media contributes to connecting with customers, enhancing the recognition of Cengiz Holding, and informing the public about commercial activities and corporate social responsibility projects. However, these activities must be conducted with care to avoid damaging the reputation of Cengiz Holding.

The following principles must be observed when using corporate social media accounts:

- All communications must be accurate, transparent, ethical, and compliant with applicable legal regulations, the Cengiz Holding Code of Ethics, and relevant policies.
- It must be ensured that the information shared is not confidential or of a trade secret nature.
- Third-party visuals, information, or personal data may only be used with the consent of the relevant individual/institution and in compliance with GDPR and KVKK regulations.
- Employees authorised to post on behalf of Cengiz Holding must have received the necessary training in this regard. Posting from official accounts by unauthorised individuals is strictly prohibited.
- Respect must be shown to all individuals, cultures, beliefs, ethnic origins, sexual orientations, and political views.
- Questions from the media or the public must be answered only by authorised company spokespersons.

- Account access, passwords, and posting rights must be restricted solely to the relevant employees; when an employee leaves the Company or changes role, access rights must be revoked immediately.

### **Individual Use of Social Media by Employees**

Employees are prohibited from making any visual, audio, or written posts on their personal social media accounts that could damage the reputation of Cengiz Holding, contain information relating to the Holding, or violate Holding policies. Such conduct may result in disciplinary sanctions or termination of employment.

If employees encounter a comment, question, or suggestion about Cengiz Holding on social media, they must not respond and should report the matter to the Corporate Communications Department. The same procedure must be followed if any post is observed that could harm the Holding's reputation.

When using personal social media accounts, employees must pay attention to the following behaviours:

- Posts must avoid statements that could be perceived as the views of Cengiz Holding.
- Content that is derogatory, offensive, or in violation of competition rules concerning competitor companies must not be shared.
- Applications of unknown origin must not be downloaded onto Holding-owned devices, nor should access that risks the privacy of employees, customers, or third parties be permitted.
- Non-public financial information or strategic plans of the Holding must never be shared.
- Excessive time must not be spent on personal social media accounts during working hours.
- The Holding's name or logo must not be used on personal social media accounts without prior authorisation.
- Strong passwords must be used for accounts, and passwords must not be shared with anyone.
- Unreliable links or content must not be engaged with.

## **5. Roles and Responsibilities**

All Cengiz Holding employees are obliged to comply with this Policy. In the event of a situation contrary to the rules set out in the Policy, employees must immediately report the matter to at least one of the following channels:

- Corporate Communications Department, or
- Legal Department

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.

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

Cengiz Holding employees are personally responsible for posts and communications made through their personal accounts in relation to the Company. In the event of a criminal situation, the individual concerned, not the Company, will be held accountable.

This Policy shall be updated in the event of changes or new developments in local and national laws and regulations. In cases where the Policy has not yet been updated, the stricter rule shall prevail.

Employees shall be provided with regular training and information on the use of social media and communication in line with changes in laws and regulations.

If posts made through official or personal accounts violate this Policy or conflict with the corporate identity of Cengiz Holding, employees may be subject to disciplinary sanctions, including termination of employment.

**6. Revision History**

This Policy has been approved by the relevant Board of Directors Resolution of the Company and entered into force. The periodic update of the Policy, in line with changes in applicable legislation and Group processes, is the joint responsibility of the Corporate Communications and Legal Departments.

| Revision No. | Revision Date | Description   |
|--------------|---------------|---|
| 01           | 15.09.2025    | Revised to enhance alignment with applicable legislation, international standards, and company practices. |