

COMPANY: SÖĞÜT İNŞAAT A.Ş.

DOCUMENT NO: SGT-KRY-POL-005

DOCUMENT TITLE: CONFIDENTIALITY, TRADE SECRETS, PERSONAL DATA PROTECTION, INFORMATION SECURITY, SOCIAL MEDIA USE, AND MEDIA RELATIONS POLICY

REVISION NO: 01

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1. PURPOSE AND SCOPE

This Confidentiality, Trade Secrets, Personal Data Protection, Information Security, Social Media Use, and Media Relations Policy ("Policy") aims to stipulate the principles and the rules applicable to Confidential Information and to ensure compliance of Söğüt İnşaat with data security and protection regulations.

Söğüt İnşaat is committed to carrying out its operations in compliance with all applicable laws, regulations, and rules in relation to information security and protection legislation. This Policy is expected to be complied with by Employees and Third Parties that act on behalf of Söğüt İnşaat.

Söğüt İnşaat A.Ş. Board of Directors is responsible for the oversight of the Policy, and the Authorized Directors are responsible for ensuring compliance with the confidentiality and information security procedures of Söğüt İnşaat.

Definitions and Abbreviations

- **Affiliated Party:** Persons or institutions whose information or data will be protected under this Policy.
- **Authorized Directors:** The Information Security Director, Compliance Team, and Legal Counsel of Söğüt İnşaat.
- **Business Partners:** All representatives, subcontractors, and consultants acting on behalf of the company.
- **Confidential Information:** Information that, if disclosed without authorization, could harm the interests of the individuals or entities to whom it relates or belongs; be detrimental to them; cause reputational damage; or lead to the violation of any third party's rights. This includes financial data, business strategies, details about subsidiaries, salary information, and employee data.
- **Employee:** All employees including managers, directors, and board members of Söğüt İnşaat.

- **Personal Data:** Any information that relates to an identified or identifiable living individual.
- **Trade Secret:** Information regarding or belonging to Söğüt İnşaat that may provide economic benefits against competitors.

2. GENERAL PRINCIPLES

2.1. Confidentiality

Söğüt İnşaat attributes importance to the confidentiality of data, the disclosure of which may create a disadvantage for the Group or result in breaching third-party rights. Employees are prohibited from disclosing Confidential Information to unauthorized persons, and this obligation continues indefinitely even after the termination of employment.

Employees are expected to:

- i. Decline any Confidential Information not related to their work and not use it for personal matters,
- ii. Notify superiors and Authorized Directors in writing in case of unauthorized access,
- iii. Only disclose Confidential Information to authorized persons on a "need to know" basis after taking requisite measures,
- iv. Follow protection regulations including the General Data Protection Regulation (GDPR), Law on Protection of Personal Data (Law No 6698), and ISO/IEC 27001 Standards,
- v. Avoid discussing Confidential Information in public areas, social media platforms, or mobile applications,
- vi. Return all Confidential Information, including originals and copies, upon leaving their position,
- vii. Refrain from inputting any Confidential Information associated with Söğüt İnşaat into artificial intelligence applications.

2.1.1. Trade Secrets

Employees must use acquired Trade Secrets only for intended corporate purposes. It is strictly prohibited to use or disclose Trade Secrets with the intention to harm Söğüt İnşaat or to derive illegal benefits. Employees must not unlawfully attempt to obtain trade secrets belonging to competitors.

2.1.2. Personal Data

Söğüt İnşaat ensures that Personal Data is collected and processed in line with honesty rules,

legality, accurate and up-to-date principles, and for explicit, legitimate purposes. Data processing is kept limited and proportionate to the intended duration required by relevant legislation.

2.2. Information Security

All information of Söğüt İnşaat, its Employees, or Affiliated Parties is secured against unauthorized access. Risks arising from physical, environmental, or internal aspects are systematically managed. Information security incidents are recorded, requisite measures are taken, and periodic trainings are conducted to raise employee awareness.

2.3. Social Media Usage

When sharing content on social media, employees must avoid posting any information, photographs, or content that may lead to ambiguity or violate Söğüt İnşaat's confidentiality rules. Employees must ensure that personal opinions are not perceived as being associated with Söğüt İnşaat.

2.4. Relations with Media

Employees, except for designated official spokespersons in corporate instructions (SGT-KRI-TLM-002), are not permitted to give statements to broadcasting organizations or participate as speakers in events on behalf of Söğüt İnşaat. If contacted by the media, the Corporate Communications Department must be informed immediately.

3. REPORTING OF VIOLATIONS

Each Employee and Third Party engaged in a business relationship with Söğüt İnşaat is required to immediately report any actual or suspected violation through the established corporate channels:

- **Email:** etik@sogut-insaat.com.tr
- **Web:** sogut-insaat.com.tr/ethics
- **Ethics Hotline:** 0312 287 33 13

Söğüt İnşaat takes all reports seriously. All reports received are kept confidential unless there is a legal obligation to disclose them.

Please refer to Söğüt İnşaat Whistleblowing Policy (SGT-KRY-POL-002) for details.

Ahmet KAPUSUZ

Company Manager / Őirket M¼d¼r¼