



Document Name	Information and Data Security Policy		
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Department	Legal and Compliance Department		
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1. PURPOSE AND SCOPE

The Information and Data Security Policy ("the Policy") has the purpose of setting out the essential elements and measures that must be met regarding the Information and Data Security matters as part of the operations conducted by Polat Group Holding A.Ş. and its Group Companies ("Polat Group", "the Group").

Polat Group companies and their managers and employees must abide by this Policy.

2. ABBREVIATIONS and DEFINITIONS

Information: shall mean Confidential and Insider Information.

Information and Data Security: shall mean the whole set of measures taken for the protection of Information and Date.

Due Diligence: shall mean the identification of the organization's third parties and confirmation of such identifications from reliable sources, determination of the financial transactions' final beneficiaries, acquisition of shareholding details and identification of owners in the case of legal entities, acquisition of information on any type of transactions to be established and on the nature thereof, and periodic implementation of these matters also after the establishment of a business relation.

The Confidential Information: shall mean the company's financial data, sales figures, information of employees and customers, wage details regarding employees and managers, products to be marketed, marketing and promotion strategies, investment and revenue plans, R&D operations, and similar confidential information.

The Insider Information: shall mean any information that, inter alia, relates to a concrete operation, may impact investors' decision, has not been disclosed to general public, may be for the benefit of those who have no access to such information, and that may impact the price of capital market instruments such as stocks, bonds, debentures, etc. if disclosed general public.

The Personal Data: shall mean any and all information regarding any identified or identifiable natural person.

The Processing of Personal Data: shall mean any and all transactions done on the data for obtaining, recording, storage, retention, modification, reorganization, disclosure, transfer, takeover, making available, classification, or prevention of the use of Personal Data through partially- or fully-automated methods or nonautomated methods providing that the latter forms part of any data recording system. Personal Data are processed as per the governing regulations of the Privacy Law and GDPR.

Polat Group: shall mean the Polat Group Companies (Polat Makine, PGR, PG Kimya, İMS, and Polat Group Holding) and all personnel employed by these companies.

Legislation: shall mean all of the relevant legislation that is applicable in Türkiye and in any jurisdiction or region where we operate for the protection of Personal Data led by the Law 6698 on the Protection of Personal Data.

The Compliance Officer: Shall mean the person that is in charge of setting the framework of compliance operations, management of a compliance program, and taking and supervision of preventive actions as per policies and procedures throughout Polat Group. The Compliance Officer shall be the Legal and Compliance Counsel.

Data: shall mean any kind of qualitative and quantitative element that may have the value of Information for Polat Group.

3. GENERAL PRINCIPLES

With an aim to raise awareness for the laws, regulations, and good practices regarding access to, use and storage of the Information and Data, Polat Group ensures the implementation of required

measures. Polat Group processes the Information that it obtains when conducting its operations without giving rise to any security breach and by observing the confidentiality elements.

4. INFORMATION AND DATA SECURITY

Elements that must be considered for the recording, processing, and protection of Information and Data are as follows:

- a. Measures shall be taken to ensure confidentiality in the media where the Information and Data, which are used for the conduct of operations, are carried, transferred, processed, and stored.
- b. Measures required for the Data integrity shall be taken and this Data's accuracy, integrity, and reliability shall be ensured.
- c. Access to Information and Data shall be exclusively granted to the personnel that should have such an authorization.
- d. All information learnt within the Group shall be kept confidential unless they are in public domain.
- e. Regarding the use of computer, telephone, tablet, internet, and software at the workplace, all employees are expected to abide by all of the relevant policies and procedures issued by Polat Group.
- f. The passwords of computers, telephones, tablets, and all Data storage devices and software shall not be shared with anyone either inside or outside the company.
- g. The Group assets shall be used only for business purposes. Personal use shall be limited only to the interests of Polat Group.
- h. Employees shall not share any proprietary Information, which they obtain as a result of their work, in their personal social media accounts even by using this Information anonymously.
- i. The business email that is provided by Polat Group shall not be used for becoming a member of social media accounts and unauthenticated websites.
- j. Polat Group must not open any emails and their attachments received from suspected senders and must forward them to Polat Group Holding's Information Technologies Team for confirmation.
- k. Documents containing any Information must not be left in the work environments and the Information must be kept confidential.

5. PROTECTION OF PERSONAL DATA

Polat Group treats the Personal Data in accordance with the legislation and especially by observing the individuals' privacy. Polt Group shall take any and all required technical and administrative measures to ensure the appropriate level of security with an aim to prevent the unlawful processing of and unauthorized access to Personal Data and to ensure the protection of Personal Data.

Polat Group shall inform the data subject regarding the purpose of obtaining the Personal Data, to whom they are disclosed, legal grounds thereof, and the rights of the data subject for the processing of the Personal Data. The Personal Data shall be anonymized, protected, submitted, and destroyed in line with the legislation.

6. TRAINING AND CONTINUOUS DEVELOPMENT

A comprehensive training program shall be created to increase the level of Information Security awareness throughout the Group. The training program shall contain information on the individual

responsibilities for the Information Security and protection of Data and the required measures to be taken for protecting the information assets, along with the Information and Data Security policies and standards.

7. AUTHORITY AND RESPONSIBILITIES

All employees and managers of Polat Group companies must abide by this Policy. Polat Group's employees shall be liable to be aware of the laws and customs of any jurisdictions where Polat Group operates.

In case the local legislation that is applicable in the jurisdictions where Polat Group operates differs from this Policy, the more conservative (stricter) of them shall be deemed valid and implemented.

Details of Information and Data Security operations shall be reported by the Compliance Officer once a year as a minimum to the Business Conduct and Compliance Committee together with the outcomes regarding purpose, beneficiary, and Due Diligence.

Please contact the Compliance Officer should you have questions regarding this Policy.

The Compliance Officer may establish any additional measures and rules that will not be in conflict with this Policy and that will be implemented in their own department by seeking the Business Conduct and Compliance Committee's approval.

Employees are urged to contact the Polat Group's Business Conduct Reporting Line for any actual or suspected breach of this Policy or governing legislation:

Email: polatgrupetik@kpmg.com

Telephone: (+90) 850 281 7343

Website: www.polatgrupetik.com

Polat Group's employees and managers shall be liable to abide by this Policy and they are aware that they will undergo investigations and sanctions in case of a breach.

The breach of this Policy by a manager or an employee may lead to serious disciplinary measures that involve dismissal.

8. RECORDS

This Policy shall be shared with employees in such locations (in printed and/or electronic media) that are easily accessible by all employees at any time. The Legal and Compliance Department shall keep the original copy hereof.

9. ENTRY INTO FORCE

This Policy enters into force under the Board of Directors Resolution dated 28.12.2023. The Legal and Compliance Officer shall be responsible for considering any potential revision needs of this Policy and for revising it.