COMMUNICATION POLICY

1) Purpose

The purpose of the Communication Policy (hereinafter referred to as the "Policy") is to define the necessary standards and expectations for establishing a strong communication framework for ERCİYES ÇELİK HALAT A.Ş. (hereinafter referred to as the "Company") in all internal and external communication processes, based on the principles of honesty, transparency, and professionalism.

2) Definitions

This section briefly explains the specific terms and concepts used in politics as follows.

Company: Erciyes Çelik Halat Tel Sanayi ve Ticaret A.Ş.

Policy: Communication Policy

Employee: Refers to company managers and employees.

Internal Stakeholders: Refers to the Company's senior management and employees.

External Stakeholders: Refers to individuals, groups, or organizations outside the Company that are affected by or have an impact on the Company. This may include the Company's customers, the public, suppliers, business partners, investors, local communities, public authorities and regulatory bodies, academic institutions, financial institutions, non-governmental organizations, industry associations and professional organizations, and media organizations.

3) Scope

3.1) This Policy covers:

All Employees of the Company,

Companies from which goods and services are procured, all business partners, and their employees,

Outsourced service providers: including consultants, lawyers, advisors, and external auditors, as well as all individuals and entities acting on behalf of the Company, and the entire value chain, including customers with whom the Company has commercial relationships.

4) Principles and Guidelines

4.1) Communication Rules

4.1.1) Transparency

4.1.1.1) The Company adopts the principle of transparency and accuracy in communication. It promotes the sharing of truthful, accurate, and up-to-date information in both internal and external communications. The dissemination of misleading or manipulative information is strictly unacceptable.

4.1.2) Integrity and Ethical Principles

4.1.2.1) The Company strictly adheres to universally accepted ethical principles and the Code of Ethics Handbook in all communication processes.

4.1.3) Confidentiality and Data Security

4.1.3.1) The Company is obliged to protect the confidentiality of customer information, trade secrets, employee data, and other sensitive information. In communication processes, confidential information is shared only among authorized people, and full compliance with applicable laws is ensured.

4.1.4) Communication and Feedback

4.1.4.1) Communication should not be one-way but mutual and interactive. The Company establishes open communication channels with employees, customers, and other stakeholders and encourages processes for giving and receiving feedback. It makes continuous improvements by taking this feedback into consideration.

4.1.5) The Company promotes effective communication among different cultures and language groups. It respects cultural diversity and creates an environment in communication processes where everyone can express themselves. It does not engage in any discrimination based on race, gender, religion, or other personal characteristics.

4.2) Communication Methods

4.2.1) The methods to be used when communicating with stakeholders are set out in the Stakeholder Engagement Policy.

4.2.1.1) Preferred channels for internal communication include email, instant messaging, meetings, and other internal communication platforms.

4.2.1.2) In external communications, communication with customers is generally conducted via email, telephone, or face-to-face meetings. Social media platforms are also used carefully by individuals representing the Company.

4.2.2) Situations that are contrary to or suspected to be in violation of the Code of Ethics Handbook, the Anti-Bribery and Anti-Corruption Policy, the Donation and Aid Policy, the Human Rights Policy, and the Competition Policy may be reported through the Ethics Line.

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4.3) Communication in Emergency Situations

4.3.1) The communication methods to be used in emergency situations are set out in the İSG-PL-04 Emergency Plan.

4.4) Record Keeping

4.4.1) All communications shall be recorded in writing to the extent possible. These records must include the following information:

Minutes of meetings,

Original copies of all communications in any format, including correspondence, notes, emails, posters, etc.

4.4.2) Records of communication related to Management Systems must be organized and retained in a manner that allows for easy access and review. For this purpose, folders created specifically for all departments on the shared network and the ECH SharePoint platform are used.

5) Roles and Responsibilities

5.1) Board of Directors

5.1.1) The Board of Directors is responsible for the overall supervision of the establishment, implementation, and updating of the Policy.

5.2) Sustainability Committee

5.2.1) The Sustainability Committee is responsible for managing the processes related to Stakeholder Engagement in coordination with the Corporate Communications Department.

5.3) Corporate Communications Department

5.3.1) The Corporate Communications Department is responsible, on behalf of the Board of Directors, for ensuring the establishment, implementation, and updating of the Policy.

5.3.2) The Corporate Communications Department is responsible for establishing accurate and effective communication with Internal and External Stakeholders and for setting up the necessary communication mechanisms.

5.3.3) The Corporate Communications Department is responsible for managing the processes related to Stakeholder Engagement in coordination with the Sustainability Committee.

5.4) Department Managers

5.4.1) Department Managers are responsible for implementing this procedure within their respective areas of operation and for ensuring that the subcontractors they work with comply with this procedure.

5.4.2) Department Managers are responsible for ensuring that the necessary organizational and technical resources required for communication are provided effectively and in a timely manner.

5.4.3) Department Managers are responsible for ensuring that employees and subcontractors under their supervision receive training related to the scope of this procedure.

5.4.4) Department Managers are responsible for ensuring the implementation and monitoring of the action plans established for communication.

5.4.5) Department Managers are responsible for ensuring that communication-related needs identified through risk assessments are addressed.

5.4.6) Department Managers are responsible for monitoring and improving the system for continuous improvement.

5.5) Employees

5.5.1) Employees are responsible for attending meetings that are relevant to them and in which their participation is requested.

5.5.2) Employees are responsible for using the relevant communication methods in the course of performing their duties.

5.5.3) Employees are responsible for providing feedback and/or sharing their opinions regarding the effectiveness of communication and any potential risks they observe,

primarily with their supervisors or managers and with the Corporate Communications Department.