CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. Introduction

At CCN Holding and its Group companies, we strive to be a good corporate citizen in everything we do.

For this reason, we have brought together our existing operating principles under a unified Corporate Social Responsibility (CSR) framework policy.

The principles set out in this policy cover all areas of our operations, have been developed in line with relevant corporate governance principles and international standards, and are regularly reviewed and updated accordingly.

Our Boards and Committees support these principles and standards, translate them into guidelines and standards that establish a common approach across the Group, and provide practical guidance for our on-site managers and employees.

2. Compliance, Monitoring, and Reporting

We continuously monitor compliance with this policy, and the Board regularly reviews it.

Each local manager is responsible for ensuring that this policy is communicated to all employees, properly understood, and effectively implemented within their areas of responsibility.

Employees who have a reasonable suspicion of a violation of this policy must report it to their immediate supervisor, senior management, or through the reporting mechanisms established within the Holding.

No form of retaliation, intimidation, or harassment against employees who report in good faith is tolerated. Disciplinary action is taken against anyone engaging in such conduct.

The Board will not criticize any loss of business resulting from adherence to the principles of this policy.

3. Code of Business Conduct

3.1. General Statement

This Code of Business Conduct defines the standards expected from the employees of CCN Holding and its Group companies in all internal and external relationships with colleagues, customers, stakeholders, and third parties.

3.2. Fundamental Code Standards

- We conduct our business with honesty, integrity, and transparency in every respect, showing respect for human rights and for the interests of our employees, customers, and third parties.

- We respect the legitimate interests of third parties.
- We uphold the highest standards of integrity, never promise more than is reasonable, and do not make commitments we cannot keep.

3.3. Employees

- We foster a workforce built on mutual trust and respect, free from any form of bullying, mobbing, or harassment,
  where everyone feels responsible for the Company's performance and reputation.
- We respect individuals' rights, customs, and traditions, as well as their freedom of association and right to unionize, and we engage in good-faith dialogue with duly elected
  employee representatives.
- In line with the Equal Opportunity Policy, we conduct recruitment and promotions based on objective criteria and the qualifications and competencies required for the position.
- We maintain strong communication with our employees through our information-sharing and consultation processes.
- We support our employees in realizing their potential by providing appropriate training and development opportunities.
- We respect the privacy of our employees' personal data.
- We fairly reward employees for their contributions to the company's success.
- We operate mechanisms that enable the secure reporting of legitimate concerns about corruption and ensure that no one is victimized for reports made in good faith.
- We provide the necessary information and training to ensure compliance with this Code and the related policies.
- We strive to protect our employees from third-party exploitation that may adversely affect their safety, health, or well-being.

3.4. Business Integrity

- We build our relationships with suppliers, stakeholders, and other parties on mutual trust, understanding, and respect.
- We expect those we do business with to adhere to business principles consistent with our own.
- We carry out our operations in full compliance with fair competition principles and applicable regulations.

- Accounting and other records must accurately and honestly reflect the nature of transactions; no unrecorded accounts, funds, or assets shall be maintained.
- We comply with all applicable laws and regulations wherever we operate and seek legal advice whenever necessary.
- We review and monitor our business risks, including social and environmental risks.
- We do not facilitate, support, or tolerate any form of money laundering activity.

3.5. National and International Trade

- We engage in fair and ethical competition within the framework of competition and antitrust laws and do not obstruct others from competing fairly with us.
- In our international operations, we comply with all export control laws and applicable sanctions.

3.6. Personal Conduct

- All employees are required to act in compliance with this Code of Business Conduct.
- Company assets (buildings, vehicles, equipment, cash, procurement cards, etc.) must be protected and not misused.
- Emails, internet, information systems, and telephones must be used for business purposes only, in accordance with this Code and relevant IT policies.

3.7. Bribery

- No employee or anyone acting on our behalf shall give or accept any bribe, facilitation payment, or other improper payment.
- This rule applies to all transactions with public officials and private individuals or entities, including all payments and benefits provided directly or through third parties.
- The Group ensures the establishment, effective communication, and implementation of adequate procedures to prevent the risk of bribery.

3.8. Gifts, Entertainment, and Improper Payments

- Gifts or entertainment exceeding USD 150 that are intended to influence business decisions or may give such an impression shall not be accepted or offered.
- No employee shall offer, give, solicit, or accept any incentive or improper benefit.

- In case of any doubt, employees must consult their immediate supervisor or the Group HR Director.

3.9. Conflicts of Interest

- We respect our employees' privacy. However, all employees are expected to refrain from personal relationships, activities, or financial interests that may conflict with their responsibilities toward CCN Holding and its Group companies.
- Employees and consultants shall not use their positions or the Company's resources or assets to obtain any benefit for themselves or others.
- All actual or potential conflicts of interest, including those involving close relatives or shared interests, shall be disclosed to the relevant department head and assessed.
- Pricing information shall not be disclosed to unauthorized persons or third parties under any circumstances.

3.10. Confidentiality

- Information obtained during employment shall not be used for personal gain or for any purpose other than its intended use.
- Due care is taken to protect all confidential information obtained during business processes.

3.11. Occupational Health and Safety

- We are committed to creating and maintaining a safe and healthy working environment for our employees, customers, and communities.

3.12. Environment

- We are committed to continuous improvement in managing our environmental impact.
- All employees are expected to comply with local environmental management systems and support the improvement of environmental performance.

3.13. Customers

- We are committed to providing our customers with safe, high-quality, consistent, accessible, and reliable services.
- Employees are expected to act respectfully and honestly in their relationships with customers and public officials.
- In particular, we protect the well-being of vulnerable groups and uphold the highest standards of personal conduct in situations requiring a relationship of trust.
- Keeping our promise is one of our core values. Our commitment is to

deliver safe, reliable, customer-oriented, innovative, and sustainable services.

3.14. Supply Chain

- We work with an extensive supplier network to deliver our core services. This makes strong and sustainable supplier relationships one of the fundamental elements of our business.
- While procuring competitive goods and services, we strive to ensure that they come from sources that do not endanger human rights, occupational health and safety, or the environment.
- We expect our suppliers to adopt and implement safety, environmental, product quality/management, labor, human rights, social, and legal standards in compliance with our Supplier Code of Conduct.
- We strive to develop long-term business relationships based on mutual benefit, in line with our quality, environmental performance, and sustainability objectives.

3.15. Social Engagement

- In the regions where we operate, we engage with all segments of society and are committed to building strong relationships with these communities and establishing social
  partnerships for positive change.

3.16. Implementing the Code of Business Conduct

- The Corporate Governance Board is the highest decision-making authority in the implementation of this Code.
- The Corporate Audit Department resolves any implementation or interpretation issues that cannot be resolved at regular audit levels under the oversight of senior management.
- The Human Resources Department implements the necessary rules and procedures to ensure full compliance. It also takes the necessary measures to ensure that all employees, suppliers, subcontractors, and consultants know, understand, and apply these Rules.
- Employees who require further information may contact the Human Resources Department.

4. Employment

4.1. Equal Opportunity and Diversity Policy

The Board is committed to equal opportunity in the delivery of public services and as an

employer. The objective of this Policy is to ensure the fair, equitable, and consistent treatment of employees, customers, contractors, and all other individuals or entities that interact with CCN Holding and its Group companies.

Senior Management is responsible for ensuring the following: -

- Creating a productive and healthy working environment that promotes diversity and inclusion.
- Actively promoting and making the diversity policy and its practices visible.
- Developing new initiatives to enhance the engagement of employees, contractors, and customers.
- Supporting continuous improvement in diversity and equal opportunity.

4.2. Regulations and Codes of Practice

This Policy complies with international regulations and the applicable codes of practice in the countries where CCN Holding and its Group companies operate. The Policy is continuously monitored to ensure compliance with supplementary regulatory requirements and aims to go beyond legal requirements whenever possible.

4.3. Recruitment

All recruitments are carried out in a fair, equitable, and consistent manner for all candidates. Recruitment practices are inclusive, and barriers to employment are removed within the framework of applicable regulations.

4.4. Employee Training

In line with our approach to being an inclusive employer and service provider, guidance and training are provided to raise awareness and strengthen equity and diversity.

4.5. Human Rights

The Human Rights Policy is one of the core policies of CCN Holding and its Group companies. This Policy contains all necessary definitions.

- All employees are treated fairly and honestly regardless of their place of duty, agreed working conditions are provided, and appropriate vocational training is delivered.
- A fair wage policy reflecting local market conditions is applied, and employees are never paid below the national minimum wage.
- Working hours are arranged so as not to be excessive and are planned in accordance with industry practices and applicable national standards.
- Employment is freely chosen. Unlawful child labor, forced labor, bonded labor, and compulsory overtime are not permitted or tolerated.

- Full compliance is ensured with applicable anti-discrimination laws and regulations in all countries where we operate.
- Physical punishment, psychological or physical coercion, and verbal harassment are not accepted or tolerated. Disciplinary procedures shall be applied for any conduct that falls short of these standards.