

Doc. Code: 25-BTA-10

Publication Date: 04.04.2025

**Rev.No**: 0

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#### **ARTICLE 1. PURPOSE**

**1.1.** The purpose of the Communication Policy (hereinafter referred to as the "Policy") is to establish the necessary standards and expectations for building a strong communication structure based on the principles of honesty, transparency, and professionalism in all internal and external communication processes of Beta Enerji ve Teknoloji A.Ş. (hereinafter referred to as the "Company").

### **ARTICLE 2. DEFINITIONS**

**2.1.** In this section, specific terms and concepts mentioned in the Policy are briefly explained as follows:

Company: Beta Enerji ve Teknoloji A.Ş.

**Policy:** Corporate Communication Policy

**Employee:** Refers to the managers and employees of the Company.

Internal Stakeholders: Refers to the Company's Senior Management and Employees.

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

#### **ARTICLE 3. SCOPE**

#### **3.1.** The Policy applies to:

- All Employees of the Company,
- Suppliers of goods and services, all business partners, and their employees,
- External service providers, including consultants, lawyers, advisors, and external auditors, as well as individuals and organizations acting on behalf of the Company, and all entities within the Company's value chain, including customers with whom the Company has a commercial relationship.



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#### **ARTICLE 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 encourages the sharing of truthful, accurate, and up-to-date information in both internal and external communications. The transmission 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 responsible for maintaining the confidentiality of customer information, trade secrets, employee data, and other sensitive information. Confidential information is shared only among authorized personnel, and full compliance with relevant laws is ensured in communication processes.

#### 4.1.4. Communication and Feedback

**4.1.4.1.** Communication should be two-way, mutual, and interactive. The Company establishes an open communication channel with employees, customers, and other stakeholders, and encourages the processes of giving and receiving feedback. Continuous improvements are made by taking this feedback into consideration.

### 4.1.5. Cultural Sensitivity and Diversity

**4.1.5.1.** The Company encourages effective communication between different cultures and language groups. It respects cultural diversity and creates an environment where everyone can express themselves in communication processes. No discrimination based on race, gender, religion, or other personal characteristics is tolerated

#### 4.2. Communication Methods

**4.2.1.** The methods to be used for communication with stakeholders are outlined in the **Stakeholder Engagement Policy.** 



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**4.2.1.1.** Preferred channels for internal communication within the Company are email, instant messaging, meetings, and other internal communication platforms.

**4.2.1.2.** For external communication, communication with customers is typically conducted via email, phone, or face-to-face meetings. Social media platforms are also used carefully by individuals representing the Company.

4.2.2. Situations that are in violation of or suspicious in relation to the Code of Ethics Policy, Anti-Bribery and Corruption Policy, Donation and Assistance Policy, Human Rights Policy, and Competition Policy may be reported through the Ethics Hotline.

Email: etikhat@betaenerji.com

**Company Address:** Hacı Sabancı Organize Sanayi Bölgesi Çanakkale Cd. No:11 / B Sarıçam ADANA / Türkiye

### 4.3. Emergency Communication

**4.3.1.** The communication methods used in emergencies are outlined in the Emergency Procedure and the Corporate Communication Process Procedure.

#### 4.4. Record Keeping

- **4.4.1.** All communications are recorded in writing whenever possible. These records should include the following information:
- -Meeting minutes,
- Original copies of communications in any format such as correspondence, notes, emails, posters, etc.
- **4.4.2.** Records of communications related to Management Systems should be organized and stored in a way that allows easy access and review. For this purpose, the "Communication" folder created on the shared network is used.

### **ARTICLE 5. SCOPE AND RESPONSIBILITIES**

#### 5.1. General Manager

**5.1.1.** The General Manager is responsible for the overall supervision of the creation, implementation, and updating of the Policy.



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### 5.2. Sustainability Board

**5.2.1.** The Sustainability Board is responsible for managing the processes related to Stakeholder Engagement in collaboration with the Management Systems and Sustainability Department.

#### 5.3. Management Systems and Sustainability Department

- **5.3.1.** The Management Systems and Sustainability Department is responsible for ensuring the creation, implementation, and updating of the Policy on behalf of the General Manager.
- **5.3.2.** The Management Systems and Sustainability Department is responsible for establishing accurate and effective communication with both internal and external stakeholders and setting up necessary communication mechanisms.
- **5.3.3.** The Management Systems and Sustainability Department is responsible for managing the processes related to Stakeholder Engagement in collaboration with the Sustainability Board.

#### 5.4. Department Heads

- **5.4.1.** Department Heads are responsible for ensuring the implementation of this procedure in their respective areas of work and ensuring that subcontractors they work with comply with this procedure.
- **5.4.2.** Department Heads are responsible for ensuring that necessary organizational and technical resources for communication are effectively and timely provided.
- **5.4.3.** Department Heads are responsible for ensuring that employees and subcontractors under their responsibility receive training related to the scope of this procedure.
- **5.4.4.** Department Heads are responsible for ensuring the execution and follow-up of action plans designated for communication.
- **5.4.5.** Department Heads are responsible for addressing communication-related needs arising from risk assessments.
- **5.4.6.** Department Heads are responsible for monitoring and developing the system for continuous improvement.



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### 5.5. Employees

**5.5.1.** Employees are responsible for attending meetings they are involved in or requested to participate in.

**5.5.2.** Employees are responsible for using the relevant communication methods in the process of carrying out their duties.

**5.5.3.** Employees are responsible for providing feedback or sharing their opinions with their supervisors or managers and the Management Systems and Sustainability Department regarding the effectiveness of communication and any potential risks they observe.

### **ARTICLE 6. EFFECTIVE DATE**

**6.1.** This procedure has been put into effect by the General Manager's Decision dated 04.04.2025. This procedure will remain valid and in effect until a new announcement is made.

#### **ARTICLE 7. REVIEW**

**7.1.** This procedure is reviewed annually by the Management Systems and Sustainability Department based on checks related to process or technical infrastructure changes. The reviewed and updated procedure is approved by the General Manager.

#### **ARTICLE 8. RELATED POLICIES AND PROCEDURES**

- Human Resources Policy
- Stakeholder Engagement Policy
- Code of Ethics Policy
- Anti-Bribery and Corruption Policy
- Donation and Assistance Policy
- Human Rights Policy
- Competition Policy



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- Information Security Policy
- Corporate Communication Process Procedure
- Emergency Procedure

Reason for Revision:	New Document

Prepared By	Approved By
Management Systems and Sustainability	General Manager
Engineer	