

GÜRIŞ HOLDING A.Ş. AND MOGAN ENERJİ YATIRIM HOLDING A.Ş.
DISCLOSURE TEXT FOR ETHICAL BREACH NOTIFICATION REGARDING THE PROCESSING OF
PERSONAL DATA OF GROUP COMPANIES

As Gürış Holding A.Ş. and Mogan Enerji Yatırım Holding A.Ş. and its Group Companies ("**Data Controller**"); we care about the confidentiality and security of personal data and respect the fundamental rights and freedoms guaranteed by the Constitution of the Republic of Turkey with the utmost sensitivity, especially the privacy of private life. In this respect, in accordance with the Law No. 6698 on the Protection of Personal Data ("**Law**"), personal data may be processed by the Data Controller within the scope described below.

You can access the current list of Gürış Holding A.Ş. and Mogan Enerji Yatırım Holding A.Ş. and its Group Companies from the "*Group Companies*" heading at <https://www.guris.com.tr/> and the Personal Data Protection and Processing Policy, which contains detailed information on the processing of your personal data, through <https://www.guris.com.tr/TR,2646/kisisel-verilerin-korunmasi-ve-islenmesi-politikasi.html>.

A. Purposes of Processing Personal Data

The personal data may be processed by the Data Controller for the following purposes ("**Purposes**"):

- To receive your notifications and complaints regarding breach of ethics,
- To categorize and evaluate notifications and complaints received,
- To conduct ethical violation processes, investigate the incident subject to your notification,
- To communicate with you in order to obtain information about the event subject to the notification or complaints and/or to obtain additional documents,
- To take the necessary actions for the elimination of the breach of the ethics, to follow the results,
- Within the scope of fulfilling our legal obligations regarding ethical violations, to notify legally authorized public institutions, to notify and/or file criminal complaints to police force or public prosecutors' offices, and to conduct litigation and follow-up processes before courts and/or directorate of execution,
- To make the necessary reports,
- To establish the statistical data,
- To preserve the name, IP address, MAC address of the device you have made the notification and complaints in case that you make your breach of ethics notifications and complaints anonymously. In case you do not make it anonymously, to preserve your identity and contact information and your data regarding the event subject to the notification on the servers of the Data Controller or on the servers of Microsoft Corporation, the e-mail and/or cloud service provider, located abroad.

B. Transferring Personal Data to the Third Parties

The personal data subject to ethical breach notification and complaint may only be transferred to the relevant Data Controller's employees, shareholders, business partner/subcontractor/supplier employees, service provider or third parties, legal, financial and tax consultants and other consultants, auditors, judicial authorities, public institutions and organizations such as ministries and/or Microsoft Corporation in the presence of your explicit consent, which is a foreign-based e-mail and cloud service

provider, within the framework of the conditions and purposes listed in Articles 8 and 9 of the Law, in order to fulfil the above-mentioned Purposes.

C. Procedure of Collecting Personal Data and Legal Reason

The personal data are collected by the Data Controller by filling out the electronic form on the website <https://www.mogan.com.tr/TR,1339/fikirlerinizi-belirtin.html> or by face-to-face interviews.

The personal data may be processed for the following legal reasons within the scope of the personal data processing conditions specified in Article 5 of the Law.

- If there is explicit consent,
- If it is mandatory for the data controller to fulfil its legal obligation,
- If the personal data disclosed to the public by the person relevant,
- If data processing is mandatory for the establishment, exercise or protection of a right,
- In the event that data processing is mandatory for the legitimate interests of the data controller, provided that it does not violate the fundamental rights and freedoms of the relevant person.

Data relating to race, ethnic origin, political opinion, philosophical belief, religion, sect or other beliefs, appearance, membership to associations, foundations or trade unions, health, sexual life, criminal convictions and security measures and other biometric and genetic data ("Special Categories of Personal Data") listed in Article 6 of the Law can only be processed in the presence of your explicit consent and on the basis of its legal reasons. For this reason, you should not submit your Special Categories of Personal Data to the Data Controller unless it is related to your notification/complaint of breach of ethics or in your explicit consent for the processing of your data.

D. Rights of the Personal Data Owner Pursuant to the Article 11 of the Law

Pursuant to Article 11 of the Law, as the owner of personal data, you have the right to request the following from the Data Controller:

- a) To learn whether your personal data processed or not,
- b) To request information if your personal data has been processed,
- c) To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
- d) To know the third parties to whom personal data are transferred domestic or abroad,
- e) To request correction of your personal data in case of incomplete or incorrect processing and to request notification of this correction to third parties to whom your personal data has been transferred,
- f) To request the deletion or destruction of your personal data in the event that the reasons requiring its processing disappear, although it has been processed in accordance with the provisions of the Law and other relevant laws, and to request notification of this transaction to the third parties to whom your personal data has been transferred,
- g) To object to the occurrence of a result against you by analyzing your processed personal data exclusively through automated systems,
- h) To request compensation for damages in case you suffer damage due to unlawful processing of your personal data.

You can send your requests regarding the above-mentioned issues to *Gaziosmanpaşa Mahallesi Ankara Caddesi No:222 06830 Gölbaşı/ANKARA* with wet signature or to info@mogan.com.tr as signed with secure electronic signature. Your request will be answered within thirty days at the latest from

the date of your written request to us. If the transaction requires an additional costs, we reserve the right to charge the fees in accordance with the tariff determined by the Personal Data Protection Authority.