

Gülermak Ağır Sanayi İnşaat ve Taahhüt A.Ş.
Information Security Management System Policy (ISMS)

This is Gülermak's Information Security Management Policy (hereinafter referred to as "the Policy") which outlines its management approach to the business critical subject of Information Security. Compliance with this Policy is mandatory and will ensure that Gülermak will achieve its business objectives – in compliance with relevant legislation, whilst mitigating the reputational risk arising from the deliberate or inadvertent release of business sensitive information.

Gülermak provides construction and contracting services in many jurisdictions throughout the world. and considers it crucial to maintain and develop an efficient, reliable, and high-performance Information Security Management System (ISMS). The ISMS is a part of Gülermak's Integrated Management System that is accredited to ISO9001, 14001 and 45001

Gülermak's ISMS has been developed in accordance with the ISO/IEC 27001 standard and will enable Gülermak to achieve its global aim to measure and verify its commitment on the availability, confidentiality, and integrity of information, by relying on a business continuity and traceability process together with the interaction with the infrastructure of our suppliers, subcontractors, stakeholders, and employers. This covers the activities of tender preparation, authority and public information management, design, planning, and progress reporting.

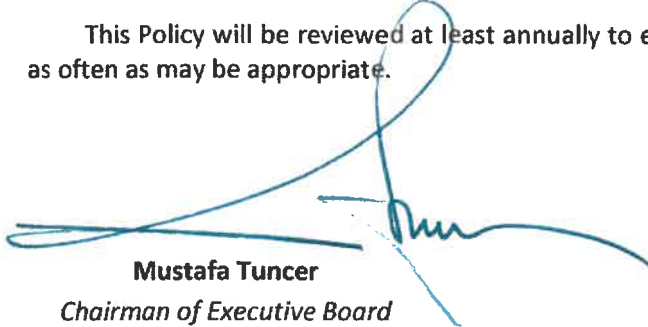
The key business objectives that Gülermak has used in the development of the ISMS are:

- We are committed to maintaining our information security while complying with the legal and regulatory requirements applicable to our business activities, contractual obligations, the requirements of the ISO/IEC 27001 standard, and any other applicable requirements.
- We are committed to securing information against internal and external dangers that could possibly result in breaches of confidentiality, availability and integrity. Through the efficient management of our ISMS, we manage our, stakeholders' and employers' assets, and we minimise the risk of revealing information to unauthorised parties, protecting it against unauthorised modification, theft or destruction.
- We will continually improve our ISMS, by undertaking risk analysis, reviews, training and audits, and closing monitoring our performance indicators.

Every person who works for Gülermak is responsible for acting in accordance with the ISMS, monitoring compliance with the Policy at their premises, reporting any noncompliance and making suggestions to continually improve our ISMS.

Gülermak's Senior Leadership team is responsible for communicating and ensuring that everyone understands our Policy and related objectives. The Senior Leadership team also ensures that the system which is established is planned, shared, and deployed efficiently by providing the necessary human, organisation and technical resources.

This Policy will be reviewed at least annually to ensure its continuing validity but will be revised as often as may be appropriate.



Mustafa Tuncer
Chairman of Executive Board



Kemal Tahir Gülerüz
Chairman

11.08.2021