

DRAAKON GROUP A.Ş.
STAKEHOLDER ENGAGEMENT POLICY

As Draakon Group A.Ş., we attach importance to ensuring that all our internal and external stakeholders who are affected by or have the potential to be affected by our activities are accurately informed about our operations, and to enabling them to contribute through consultation or participation in decisions that may affect them. We consider the views of our stakeholders as an important feedback tool that we actively use to improve our sustainability performance and contribute to our continuous development. With this Stakeholder Engagement Policy, Draakon Group adopts the principles outlined below as a general framework:

- Acting with an awareness of our responsibilities toward both our internal stakeholders, namely our employees, and all external stakeholders with whom we interact during our activities,
- Adopting an approach based on transparency, accuracy, and integrity to build trust-based and consistent relationships with all our stakeholders,
- Creating a fair and efficient system to identify stakeholders with strong competencies, integrity, and a developed awareness of sustainability,
- Providing clear, easily accessible, and constructive communication that is easily understandable by stakeholders and tailored to the needs of target groups,
- Providing information prior to decision-making through consultation activities and acting by taking stakeholder expectations into consideration,
- Organizing events, seminars, and social activities by coming together with our stakeholders on a periodic basis,
- Establishing a two-way communication system that allows both parties to exchange views and information, listen, and express concerns,
- Respecting local traditions, languages, and decision-making processes, and ensuring the representation of all views, including those related to religion, sect, race, gender, political opinion, age, physical disability, and sensitive and/or minority groups,

- Establishing open and accessible mechanisms to respond to stakeholders' concerns, suggestions, and/or complaints, and providing feedback at every stage,
- Creating a feedback system that enables the receipt of opinions and complaints from stakeholders regarding environmental and social performance and sustainability,
- Setting improvement-oriented targets in areas where satisfaction levels are low and dissatisfaction levels are high, and monitoring these targets,
- Supporting stakeholders and programs that contribute to sustainable development and create shared value,
- Continuously identifying areas for improvement by benchmarking our stakeholder engagement performance against good practice examples,
- Cooperating with our stakeholders to identify emerging trends and develop solutions to potential future problems,
- Fulfilling our social and environmental responsibilities toward society in the regions where we operate through harmonious cooperation with all our stakeholders.

Purpose of the Policy

The purpose of this policy is to understand our stakeholders and their needs, to provide sufficient opportunities for them to express their views and opinions at all stages of relevant activities, to establish a positive and trust-based working relationship with our stakeholders, and to continuously improve our practices in this field.

Scope of the Policy

This policy covers our employees, business partners, customers, investors, lenders, suppliers, subcontractors, regulatory authorities, non-governmental organizations, relevant international institutions, universities, and local and national government bodies.

Implementation of the Policy and Applicable Legislation

This policy commits to compliance with and implementation of the laws, regulations, and principles in force within the borders of Türkiye. Where the activities concerned are carried out outside the borders of Türkiye, the more restrictive provisions shall be applied, if compliance with the legislation in force in the relevant country is observed. In the event of any inconsistency between the applicable legislation and this policy, Draakon Group accepts that the provisions of the applicable legislation shall prevail.

Entry into Force of the Policy

This policy is reviewed periodically and updated when deemed necessary. The Corporate Governance and Sustainability Directorate is responsible for updating the policy.

İsmet EJDEROĞLU

CEO