

2025



ODAS'S CORPORATE COMMUNICATION POLICY

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01 Purpose and Scope

ODAŞ's Corporate Communication Policy ("Policy") has been drafted to establish all internal and external communication processes in accordance with key ethical principles such as transparency, respect for human rights, integrity, and accountability in all operations of ODAŞ Elektrik Üretim Sanayi Ticaret A.Ş. ("ODAŞ"). Corporate communication is not limited to sharing information; it also conveys the corporate culture, ethical stance, and reputation of the Company.

All ODAŞ employees, managers, affiliates, and third parties communicating on behalf of ODAŞ are within the cover of this policy.

02 Key Principles of Communication

Corporate Communications Management executes all communication activities in line with ODAŞ's vision, mission, and values. In this regard, communication management processes and the content and channels promoting the brand are structured to reflect its unique characteristics and international stance.

2.1. Commitment to Ethical Values

All communication processes at ODAŞ are implemented in accordance with the principles of transparency, integrity, anti-discrimination, information security, respect for human rights, and responsible conduct as described in the Code of Ethics.

2.2. Transparency and Accuracy

It is essential that information is shared accurately, thoroughly, and in a timely manner in all communication activities. No misleading information shall be provided intentionally, and no fake content shall be created. The public shall not be misled by unrealistic or overstated messages.

2.3. Respectful and Inclusive Language

Communication with all stakeholders is conducted in a manner that respects human rights, diversity, and personal dignity. Expressions that suggest discrimination based on gender, ethnicity, religion, or other differences are avoided.

2.4. Information Security and Confidentiality

In all communications made on behalf of ODAŞ, legal obligations regarding the protection of personal data and confidential information of employees, customers, or third parties are fully realized. Corporate and strategic information is shared only with authorized individuals.



2.5. Responsibility and Accountability

The responsible party for every statement made in corporate communications is clearly defined. The source of the transmitted information is verifiable, the processes are traceable, and auditable if necessary.

03 Channels of Communication

Internal: Intranet, e-mail, WhatsApp, posters, training and orientation materials.

External: Website, press releases, social media, media interviews, communications about sponsorships and events.

Communication of Social Responsibility (CSR): Through CSR projects, ODAŞ aims to strengthen the brand perception while contributing to society.

Crisis Conditions: In accordance with the ODAŞ Crisis Communication Plan, information is provided in a centralized, prompt, and ethical manner.

04 Corporate Identity and Use of Language

ODAŞ uses a simple, clear, and reassuring tone in all its communications. Logo, colors, and visual language consistent with the corporate identity are adopted in all content used.

- In written communication, a formal but warm tone is preferred.
- A friendly yet professional tone is adopted in digital media.
- The language of communication is Turkish and, when required, professional-level English.
- A visual and written language that reflects the Company's ethical stance and reputation is used in all communications.
- The ODAŞ brand may only be represented within the framework approved by the Company.

05 Relations with the Media and Public Messages

All contact with the media on behalf of ODAŞ is conducted through the Corporate Communications department. All information to be communicated to media representatives is determined in accordance with senior management's approval. Statements made to the public shall be based on reality and comply with ethical principles. Ensuring accurate information flow and protection of institutional reputation shall be a priority. Speculation is avoided and only verified information is communicated during times of crisis.



06 Communication in Times of Crisis

In times of crisis, Corporate Communications Management steps in as the center of communication. The process is managed through rapid assessment, accurate message formulation, and selection of channels appropriate for the target audience. Internal and external reputation of the Company is a key priority.

The Crisis Management Plan is initiated in the following cases:

- The scope of damage to company assets
- The magnitude of the failure and the duration of the interruption
- Potential damage to the company's reputation
- Impact on personnel and the public (death or serious injury, etc.)

The objectives of the Crisis Management and Communication Plan are as follows:

- To protect the reputation and brand image of the Company
- Maintaining/improving the perception of the brand and/or commercial operations
- Ensuring that financial losses and casualties remain at the lowest possible level.
- Ensuring the most effective and quickest return to work.

07 Internal Communication and Engagement of the Employees

ODAŞ considers its employees not merely as informed stakeholders, but as stakeholders involved in the process. Employee engagement, motivation, and organizational culture are improved through internal communication projects. Internal communications are managed in accordance with the principles of equality, transparency, participation, and trust. Participation of employees is promoted through ODAŞ Good Life Movement, ODAŞ People volunteer projects, and social events. Communication methods that undermine psychological wellbeing, and that are exclusionary or oppressive among employees are unacceptable. Internal communication efforts are reviewed annually through a survey conducted via the intranet in April.



08 Communication of Social Responsibility

ODAŞ conducts its communication in social responsibility initiatives, which it organizes with the goal of providing social benefit, in accordance with ethical principles, and the principles of transparency, and social sensitivity. For the communication of social responsibility projects, the primary focus is not on advertising or reputation; rather, it is on increasing participation, setting an example, and creating value.

- The use of language in social responsibility projects is respectful of human dignity, equitable, and inclusive. It shall be avoided to highlight the suffering of the communities or individuals receiving assistance.
- The contributions of employees participating in volunteer activities are shared only with their permission and within an honorary context.
- Any dramatized, exaggerated, or manipulative statements that could lead to misperceptions in the eye of the public are avoided.
- Social responsibility activities are considered a natural extension of ODAŞ's sustainability vision and ethical stance.
- While announcing corporate volunteering initiatives to employees, participation is encouraged on a voluntary basis; no pressure or coercion is applied.

ODAŞ adopts a transparent, measurable, responsible, and accountable approach to the communication of its social responsibility activities, within the framework of code of ethics.

09 Reporting of Violations and ODAŞ Ethics Hotline

When a suspicion of unethical practice, discrimination, breach of confidentiality, or improper influence arises in corporate communication processes, employees can report the situation securely, anonymously, and without fear of retaliation by contacting the ODAŞ Ethics Hotline.

10 Enforcement

ODAŞ's Corporate Communications Policy has entered into force as of 25.07.2025, pursuant to the Board of Directors' Decision dated 25.07.2025 and numbered 2025/10. The effective date and version information of the Policy shall be clearly stated in the document. The Policy is published and made available on internal company systems and the corporate website.

ODAŞ Ethics Committee is responsible for implementing, monitoring, and assessing the effectiveness of the Policy. Within this scope, ODAŞ Ethics Committee identifies risks in the implementation of policies, reviews the ethics reports received, monitors the system's effectiveness regarding violations, and recommends corrective actions when necessary. Recommendations for revisions are prepared by the ODAŞ Ethics Committee and implemented by the Board of Directors. Updated versions of the Policy are clearly communicated to all employees and relevant stakeholders.



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