FORM SÜNGER VE YATAK SAN. TİC. A.Ş.

COMMUNICATION POLICY

Parent Process: Corporate Communication

Child Process: Corporate Communication

Policy: Communication Policy

Policy No:

First Released:

Approved by:

Revision No:

Latest Revised:

Approved by:

SECTION 1. OBJECTIVE

1.1.   Communication Policy (hereinafter, "Policy") aims to define standards and expectations as required for establishment of a robust communication structure based on the integrity, transparency and professionalism principles across entire internal and external communication processes of Form Sünger ve Yatak Sanayi Ticaret A.Ş. (hereinafter, "Company").

SECTION 2. DEFINITIONS

2.1. Terms used in this policy that have a specific meaning are briefly defined below:

   Company: Form Sünger ve Yatak Sanayi Ticaret A.Ş.

   Policy: Communication Policy

   Employees: Company managers and workers.

   Internal Stakeholders: Company's Top Management and Employees.

   External Stakeholders: All persons, groups or organizations other than Company that are affected by or affect Company.

These include, without limitation, customers, public, vendors, suppliers, business partners, investors, local community, public authorities, regulatory authorities, academic institutions, financial institutions, non-governmental organizations, industrial organizations and professional bodies and media outlets.

SECTION 3. SCOPE

3.1. This Policy applies to

- all employees of Company,

- service or good vendors, all business partners and their employees,

- entire value chain, including outsourcing firms, and all individuals and organizations working for Company including consultants, lawyers, advisors and external auditors, as well as customers with a business relation with Company.

SECTION 4. PRINCIPLES

4.1. Communication Rules

4.1.1. Transparency

4.1.1.1. Company adopts the transparency and accuracy principle in its communications. It encourages information shared in internal and external communications are true, accurate and up-to-date. Sharing misleading or manipulating information are strictly forbidden.

4.1.2. Integrity and Ethical Principles

4.1.2.1. Company strictly adheres to universally-recognized ethical principles and Code of Conduct Manual across its entire communication processes.

4.1.3. Confidentiality, Privacy and Data Security

4.1.3.1. Company is under obligation to ensure confidentiality of customer data, business secrets, employee data and other sensitive data. Confidential information may only be disclosed between authorized persons where full compliance with the relevant laws are ensured.

4.1.4. Communication and Feedback

4.1.4.1. Communication should not be one-way but mutual and interactive. Company creates an open communication channel with employees, customers and other stakeholders and encourages incoming and outgoing feedback channels. Such feedbacks are considered in making continuous improvements.

4.1.5 Cultural Sensitivity and Diversity

4.1.5.1. Company encourages effective communication between different cultures and language groups. It welcomes cultural diversity with respect and creates an environment where everyone can express their ideas in communication processes. Company does not tolerate any discrimination based on race, gender, religion or other personal attributes.

4.2. Communication Methods

4.2.1. Methods to be employed in communicating with stakeholders are described in the Stakeholder Engagement Policy .

4.2.1.1. Preferred channels in the internal communication include e-mail, instant messaging, meetings, etc. internal communication platforms.

4.2.1.2. In external communications, e-mail, phone or face-to-face meetings are generally used to communicate with customers. Social media platforms are also used carefully by persons representing the Company.

4.2.2. Ethics Hotline is established for reporting actual or suspected violations of Code of Conduct Manual, Anti-Bribery and Anti-Corruption Policy, Human Resources Policy and Competition Policy.

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4.3. Communication in Emergencies

4.3.1. Communication Methods used in the emergencies are provided in the TL-841-7 Emergency Help Call Instruction.

4.4. Record-keeping

4.4.1. All communications are kept under written record as practical as possible. These records should contain following:

- Meeting Records,
- Original copies of the communications in any format, correspondences, notes, electronic mails, posters, etc.

4.4.2. Communications in relation with Management Systems must be organized and stored so that it will be easy to access and review them. For this purpose, "Communication" folder created on the common network are used.

SECTION 5. SCOPE AND RESPONSIBILITIES

5.1. General Manager

5.1.1. General Manager is responsible for development, implementation and revision of the Policy.

5.2. Sustainability Committee

5.2.1. It is responsible together with IT Department for management of the processes relating to Shareholder Engagement.

5.3. Information Technology Department

5.3.1. IT Department is responsible on behalf of General Manager for development, implementation and updating of Policy.

5.3.2. IT Department is responsible for establishment of proper and effective communication with internal and external stakeholders as well as necessary communication mechanisms.

5.3.3. It is responsible together with Sustainability Committee for management of the processes relating to Shareholder Engagement.

5.4. Department Managers

5.4.1. Department Managers are responsible for ensuring this procedure are implemented within their own mandate as well as complied by the subcontractors they have hired.

5.4.2. Department Managers are responsible for providing organizational and technical resources necessary for communications effectively and on timely basis.

5.4.3 Department Managers are responsible for ensuring employees reporting to them as well as subcontractors are trained on the scope of this procedure.

5.4.4 Department Managers are responsible for implementation and monitoring of the action plans defined for communication.

5.4.5. Department Managers are responsible for meeting the needs as identified via risk assessments.

5.4.6. Department Managers are responsible for monitoring and improving the system for continuous improvement.

5.5. Employees

5.5.1. They are responsible for attending meetings that are relevant to them and/or they are invited to attend.

5.5.2. They are responsible for using the relevant communication methods while perform their tasks,

5.5.3. They are responsible for providing their supervisors or managers and IT Departments with feedback / comments on the effectiveness of communication and potential risks they may identify.

SECTION 6. EFFECTIVENESS

6.1. This Procedure is made effective with a Resolution of General Manager. This Procedure will remain in full force and effect until a revised version is put into effect.

SECTION 7. REVIEW

7.1. This Procedure is subject to regular review by IT Department annually on the basis of changes to the processes or technical infrastructure. Reviewed and updated procedure will be signed off by General Manager.

SECTION 8. RELATED POLICIES AND PROCEDURES

Human Resources Policy

Stakeholder Engagement Policy

Code of Conduct Manual

Anti-Bribery and Anti-Corruption Policy

Human Rights Policy

Competition Policy

TL-841-7 Emergency Help Call Instruction