IT Security / Cybersecurity Governance

1. Board Responsibilty

Through the Risk Committee, the Board of Directors oversees Zorlu Enerji's cybersecurity strategy, along with other strategic risks. The most recent session addressing this topic was during the "Risk Management and Audit Presentation to the Board Committee in September 2024," where the Cybersecurity risk analysis was reviewed. Independent Board Member Mümin Cengiz Ultav is responsible to oversee cybersecurity strategy and cybersecurity risks on Zorlu Enerji operations.

2. Executive Management Responsibility

	Description
Name	Fulya Bıçak Muştu
Position	IT & Business Development Director
Reporting Line	Directly reporting to IT Sector President
	Directly reporting to Risk Comittee
	Matrix reporting to CEO Zorlu Enerji
Objective of Position	Protect and monitor Zorlu Enerji's technological ecosystem against various
	information security threats.
	Manage IT risks effectively.
	Develop and implement information security policies, rules, and procedures.
	Oversee SOX compliance, including the management of internal and external IT
	audits and their respective general IT controls.
Spesific Responsibilities	Continuously update information security policies, standards, and procedures.
	Identify and manage IT risks effectively.
	Detect, analyze, and report security incidents promptly.
	Provide guidance to IT departments and the company on information security
	matters.
	Implement automated indicators for Information Security and Cybersecurity (KPI,
	KGI, etc.).
	Monitor and consolidate findings from internal and external SOX IT audits.
	Conduct internal monitoring to ensure compliance with IT controls.
	Review and update the IT General Controls (ITGC) Matrix.
	Develop, implement, and assess the outcomes of the security awareness plan
	and program.