

ZORLU ENERJİ HUMAN RIGHTS REPORT 2025

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Introduction

About the Report

Zorlu Enerji has prepared this report to present the human rights practices it carried out in 2024 and 2025 to all its stakeholders. This report has been primarily prepared in line with ESG requirements. This report contains evidence demonstrating Zorlu Enerji's strong stance on human rights and its approach to addressing it as a material issue.

About Zorlu Enerji

Established in 1993, Zorlu Enerji is an energy company that aims to operate on different fields of energy sector providing a global-scale integrated service.

Zorlu Enerji operates in various fields of the sector including electricity and steam generation and retail, electricity sales, electricity distribution, solar panel sales and installation, natural gas sales and distribution, construction, management and maintenance of power plants and EV charging stations.

Zorlu Enerji is vertically integrated across four main business segments as follows.

Electricity Generation

Within its Electricity Generation business, Zorlu Enerji works across geothermal, wind, hydroelectric and natural gas power plants. As of 2024, total installed capacity in Türkiye was 608.47 MW (mainly from renewable sources), split across the following technologies and generation assets.

In addition, Zorlu Enerji has abroad investments in a 56.4 MW wind power plant in Pakistan, a 1.5 MW solar power plant in Palestine, and a 215 MW natural gas power plant in Israel, where it is preparing for an exit from its partnership.

Power Plant	Electricity Generation Capacity (MW)	Steam Generation Capacity (Tons/Hr)
Natural Gas	49.53	98.00
Wind	135.00	
Hydroelectric	118.94	
Geothermal	305.00	
Total	608.47	98.00

Electricity Distribution

With nearly 25 years of experience and expertise in the energy sector, Zorlu Enerji is the incumbent operators of distribution services in the Osmangazi region, including Eskişehir, Bilecik, Uşak, Afyon and Kütahya cities. Zorlu Enerji provides electricity distribution services to more than 2 million connections in the region, and in 2024 distributed 7.24 TWh of net electricity.

Electricity Trade & Supply

Zorlu Enerji makes electricity sales to regulated customers in the Osmangazi region, as well as to eligible consumers across Türkiye, and is a trader in spot, OTC and wholesale markets. In 2024, Zorlu Enerji made 6.9 TWh of electricity sales to 2 million customers, while total sales of wholesale volumes reached 7 TWh.

Zorlu Enerji Solutions (ZES) & Electrip Operations

Under the ZES & Electrip Operations business segment, Zorlu Enerji conducts the installation, sale and operation of EV charging stations, to facilitate the transition to electric vehicles in Türkiye and the surrounding region. In this space, Zorlu Enerji is the market leader, with a ~60% share, operating the fastest and widest network featuring more than 4,000 sockets and with presence in 81 cities across 19 countries predominantly in Europe.

Scope & Methodologies for Due Diligence Process

Zorlu Enerji implements various standards and processes to identify human rights violations and areas for improvement on behalf of its affiliated assets, companies, suppliers, and partners. The standards, internal methods and management systems it utilizes in this context include the following:

Requirements & Due Diligence Process	Scope
Environmental & Social Impact Assessment (ESIA)	Power plants and electricity production business
IFC, IFC-PS6	Electricity Distribution business
ISO 45001	Joint ventures, power plants, electricity production business, electricity distribution process, contractors, subcontractors
ISO 26000	Critical suppliers
SA 8000	Power plants and electricity production business
Ethics Hotline (Notifications received through the ethics hotline)	All stakeholders
Via Assessment Surveys and Digital Platforms (MAP360)	Customers, critical suppliers, employees, critical stakeholders

Human Rights in Energy Sector

Globally, human rights have become a critical issue in the energy sector as companies face growing scrutiny over their impact on communities, labor conditions, and the environment. With the energy transition underway, there is a renewed focus on ensuring that renewable energy projects respect human rights, particularly in developing regions where large-scale infrastructure projects can displace local communities or affect vulnerable populations. The UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines have set the framework for due diligence, pushing companies to assess and mitigate risks in their operations and supply chains.

In the energy sector specifically, recent trends show an increased emphasis on protecting labor rights, ensuring community engagement, and safeguarding indigenous populations. Companies are now more focused on conducting human rights impact assessments (HRIAs) and adhering to international standards such as the International Labor Organization's (ILO) conventions and the Equator Principles. Energy firms are expected to implement proactive policies, including grievance mechanisms, to address potential violations, especially in regions where governance structures are weak or conflict prone. The pressure from investors, regulators, and civil society to enhance transparency and accountability continues to shape human rights practices within the industry.

Human Rights & Sustainability in Zorlu Enerji

Human rights have been identified as a high-priority issue by all stakeholders because of Zorlu Enerji's prioritization efforts involving both internal and external stakeholders, and it is evaluated within the context of the 'People & Culture' pillar, one of the three core components of the sustainability strategy.

For more information about materiality works and strategy, please refer to [Zorlu Energy Integrated Annual Report 2024](#).

While talent management and the well-being of employees—key resources are essential for ensuring the regenerative transformation of existing jobs and the design of regenerative/restorative business models—are discussed under the heading of People and Culture, human rights are integral to these efforts.

Zorlu Enerji places a strong emphasis on safeguarding the rights and dignity of all employees, ensuring fair and equal treatment, and promoting safe and inclusive work environments. Furthermore, local socio-economic development and ways of engaging with stakeholders in the regions where Zorlu Enerji operates are evaluated not only in the context of generating social benefits but also through the lens of upholding and advancing human rights, ensuring that all communities impacted by its operations are treated with respect, equity, and consideration.

Zorlu Enerji aims to increase the rate of female managers to 40%. Establishing a healthy organizational structure is important not only for employees but also for all the communities with which the business interacts.

Zorlu Enerji supports the Sustainable Development Goals by contributing to local development and to the progress of our country through both clean production and green growth, by supplying green and reliable energy.

Zorlu Enerji put smart targets and obtain KPIs for following human rights related performance. Time driven related targets and top material issues can be found via Sustainability Targets on Integrated Annual Report.

Zorlu Enerji believes that the Sustainable Development Goals (SDGs) are intrinsically linked to fundamental human rights, and we continue to invest in initiatives aligned with these goals. Zorlu Enerji Contributes UN SDGs such as.

- **4-Quality Education.** Zorlu Enerji invests more than 4.5 M TL in education in line with SDG 4 Quality Education with various projects & collaborations as stated below;
 - Zorlu Enerji Experience
 - Course Support Project
 - Enerjimiz Eşit Meslek Liseleri Project
 - Mehmet Zorlu Foundations
 - Scholarship Program
 - FutureFEM Project (2024)
 - Women Empower Program
- **5- Gender Equality.** Zorlu Enerji advocates gender equality, prevents gender discrimination in recruitment and promotion processes, and provides transparent opportunities to increase women's participation in the workforce. The company promotes gender equality in the work environment through training programs and supports women to take an active role in decision-making processes.
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 - Zorlu Holding Gender Equality Manifesto
 - Gender Equality Working Group and Gender Equality Committee
 - Becoming a signatory of WEPs
- **6- Clean Water & Sanitation.** Zorlu Enerji invest and contribute the local needs for clean water and sanitation in areas with limited access to water and sanitation. Enerjimiz Bölgemiz için Project: As Zorlu Enerji, we integrate with the local community in the regions we invest in, we undertake socio-cultural, infrastructural and technological initiatives and become a member of the community. We celebrate specific days and festivals of the region; we support the need for access to clean water in villages, and we contribute to the energy needs of schools. We further provide sponsorships for the

sports clubs in the regions we invest in and we regularly provide winter clothing to children in disadvantaged climate regions. We support local women's production initiatives and economic development by supplying our needs from local women's cooperatives as much as possible. Water Supply Facilities: 15 tankers of water were provided to Ladho Ganjo village, 4 tankers of water were provided to Jhakhro village, 4 tankers of water were provided to Mosa Atho village, and 15 tankers of water were provided to Suleman Brohi village, all located around our facility. With these monthly subsidiaries, villages were provided with access to clean water.

For details, please refer to IAR (Integrated Annual Report) Enerjimiz Bölgemiz için Project, and for water supply facilities provided to Ladho Ganjo village.

- **7- Affordable & Clean Energy,** Zorlu Enerji increases its share of renewable energy globally by investing in renewable energy resources and developing clean energy technologies. It offers innovative and efficient energy solutions to improve energy efficiency. Zorlu Enerji increases its share of renewable energy globally by investing in renewable energy resources and developing clean energy technologies. It offers innovative and efficient energy solutions to improve energy efficiency.
 - Renewable Energy Commitment
 - Power Plant investments with storage units
 - ISO 50001 projects
 - I-REC certificate sales
 - Equipment sales via ZES Solar (Solar and EV charging equipments)
- **10- Reduced Inequalities,** Zorlu Enerji creates value with sustainable social responsibility projects that will strengthen the company's egalitarian stance by eliminating inequalities in business life. Zorlu Enerji creates value with sustainable social responsibility projects that will strengthen the company's egalitarian stance by eliminating inequalities in business life.
 - Eşit Bi'Hayat (An Equal Life) program & Eşit Bi' Hayat Dictionary
 - Discourse Control Mechanism
 - Equal Opportunity Model
 - Certificate of KAGİDER
 - Rotation at Work Program
 - Power of Women,
 - Power of the Future Program
- **16- Peace, Justice and Strong Institutions,** Zorlu Enerji adopts an ethical, transparent and accountable corporate governance approach by developing and implementing fair and anti-discrimination policies for all stakeholders. Zorlu Enerji adopts an ethical, transparent and accountable corporate governance approach by developing and implementing fair and anti-discrimination policies for all stakeholders.

- Stakeholder Communication
- Environmental and Social Governance Principles Commitment

Human Rights Commitments

Zorlu Enerji has developed and implemented its Corporate Restructuring and Human Rights Commitment in alignment with the Human Rights Policy of Zorlu Holding, of which it is a 32.3% shareholder. In accordance with this commitment, Zorlu Enerji has also developed its Supply Chain Policy, Human Rights Policy, and Occupational Health and Safety Policy for different purposes of related Management Systems. These commitments align with our social responsibility standards implementations; ISO 45001, ISO 26000 and ethical labor practices as outlined in SA8000, demonstrating our dedication to protecting and promoting human rights within our organization.

You can access these policies through the following links.

- [Zorlu Holding Human Rights Policy](#)
- [Zorlu Enerji Human Resources Policy](#)
- [Zorlu Enerji Sustainable Supply Chain Policy](#)
- [Zorlu Enerji Health & Safety Policy](#)
- [Zorlu Enerji Social Responsibility Policy](#)

Corporate Restructuring and Human Rights Commitment



At Zorlu Enerji, we are committed to respecting and upholding human rights in accordance with internationally accepted standards, including the United Nations Universal Declaration of Human Rights, the International Labor Organization's core conventions, and other global agreements to which our country is a party. This commitment highlights requirements and spans across our operations, partnerships, suppliers, and the products and services we offer.

We prioritize the well-being of our employees and ensure that corporate restructuring processes (such as company sales, mergers, acquisitions, or changes in business processes) do not negatively impact their rights or working conditions. Our commitment includes the following key principles:

1. Respect for Human Rights Across All Operations

We are committed to preventing and addressing human trafficking, forced labor, child labor, discrimination, and ensuring freedom of association, the right to collective bargaining, equal remuneration, and non-discrimination across all areas of our operations, including employees, direct activities, products, and services.

2. Employee-Centered Restructuring

We ensure that our employees' rights and well-being are at the core of any corporate restructuring process, with measures taken to mitigate any negative impacts on their rights, working conditions, and employment security.

3. Human Rights Due Diligence

We conduct thorough human rights due diligence in our own operations, focusing on labor rights, safety, and working conditions, particularly during periods of corporate change. This includes assessments across direct activities, products, and services, to ensure that no adverse human rights impact occurs.

4. Senior Leadership Involvement

Our senior leadership plays an active role in guiding and overseeing restructuring processes, ensuring institutional integration and the safeguarding of human rights throughout all stages of corporate transitions.

5. Dialogue and Problem Resolution

We foster open and continuous dialogue with employees and their representatives, ensuring that any concerns or issues arising during corporate changes are addressed promptly and transparently. Our aim is to resolve problems in a collaborative manner that respects employees' rights.

6. Transparency in Corporate Change

We provide clear and timely communication to all employees, including employee representatives, about corporate changes and transformation processes. We ensure that these processes are carried out in line with our commitment to respect workers' rights and prevent any recurrence of violations.

Application to Suppliers and Partners

Our commitment extends beyond internal operations. We require that our suppliers and partners adhere to the same human rights standards we uphold. We conduct assessments and maintain strict oversight to ensure that our business relationships are free from human rights violations, including human trafficking, forced labor, child labor, and discrimination. Suppliers and partners are expected to uphold freedom of association, the right to collective bargaining, and provide equal remuneration to all workers, regardless of gender, race, or other forms of discrimination.

By embedding these principles into our corporate strategy, we aim to ensure that human rights are respected not only within our own operations but throughout our entire value chain, fostering a workplace and business ecosystem where all stakeholders are treated with dignity and fairness.

Elif YENER

CEO, Zorlu Enerji

Human Rights Due Diligence Process

At Zorlu Enerji, our human rights due diligence process adopts a comprehensive approach to identify, assess, and mitigate risks related to forced labor, human trafficking, child labor, and other potential human rights violations across our operations and value chain. This process ensures that we safeguard the rights of all individuals impacted by our business. Our due diligence process covers the following key elements:

1. **Risk Identification in Our Own Operations**

We systematically identify potential human rights risks within our direct operations, ensuring that our employees can freely exercise their **freedom of association** and the **right to collective bargaining**. Regular assessments are conducted to guarantee that **equal remuneration** practices are in place and that any forms of **discrimination** are promptly addressed.

2. **Risk Identification in Our Value Chain**

Our due diligence extends to our entire value chain, where we actively assess risks related to **forced labor**, **child labor**, and **human trafficking** within the operations of suppliers, contractors, and partners. This ensures that human rights standards are upheld throughout the supply chain.

3. **Risk Identification in New Business Relations**

We conduct comprehensive human rights evaluations when entering new business relationships, such as mergers, acquisitions, and joint ventures. These assessments focus on identifying risks like **human trafficking**, **forced labor**, and **discrimination**, ensuring that human rights are respected in all new ventures and partnerships. Code of Conduct alignment is main instrument for risk identification process in new business relations.

4. **Systematic Periodic Review of Risk Mapping**

We perform **systematic, periodic reviews** of our human rights risk mapping, assessing both actual and potential risks, including those related to **forced labor**, **human trafficking**, **child labor**, **discrimination**, and the **right to collective bargaining**. This continuous review process allows us to proactively address concerns and adapt to emerging human rights challenges. Risk mapping is done in scope of ERM process and used for materiality process.

How do we identify and manage human rights issues?

Human rights issues associated with value chain

Zorlu Enerji identifies actual or potential human rights risks within its own operations and across its value chain. In this context, the company considers the following eight potential human rights risk areas:

- Working condition
- Health and Safety
- Discrimination included equal remuneration
- Forced/ illegal migrant labor, child labor, human trafficking
- Right to collective bargaining and Freedom of Association
- Data security and privacy
- Standard of livings
- Products and service safety

Rights Holders	Employee	Supplier/Contractors	Community	Customer
Human Rights Issues Assessed	Working condition	Working condition	Health and Safety	Service safety
	Health and Safety	Health and Safety	Discrimination	Discrimination
	Discrimination included equal remuneration	Discrimination included equal remuneration	Standard of livings	Data security and privacy
	Forced/illegal migrant labor, child labor, human trafficking	Forced/illegal migrant labor, child labor, human trafficking		
	Rights to collective bargaining and freedom of association	Data security and privacy		
	Data security and privacy	Rights to collective bargaining and freedom of association		

Scope of the Human Rights risk assessment

As part of its Human Rights Risk Assessment, Zorlu Enerji evaluates all operational sites both in Türkiye and abroad, covering 100% of its own operations. This includes employees, subsidiaries, customers, local communities, critical and strategic suppliers, contractors, and third-party contracted labor.

The risk identification process also extends to new business relationships, such as mergers and acquisitions.

Zorlu Enerji conducts the Human Rights Risk Assessment at the corporate level to identify, prevent, and mitigate risks that may lead to human rights violations. The assessment focuses on all rightsholders, including employees, contractors, suppliers, third-party labor, local communities, and customers — with special attention to vulnerable groups such as the elderly, children, pregnant women, women, persons with disabilities, migrant workers, and indigenous peoples.





All findings are consolidated and reported as part of Zorlu Enerji's human rights risk and mitigation efforts.

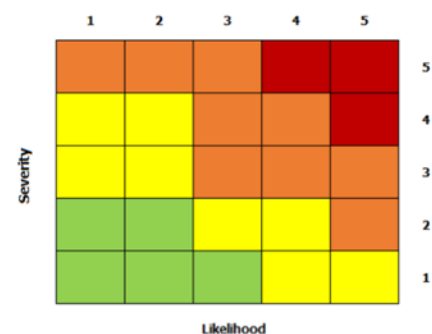
Methodology

Zorlu Enerji uses the risk matrix to define the level of potential risks related to human rights issues by considering the category of probability or likelihood against the severity of risk and impact. The risk level is categorized into 4 levels, consisting of Low, Medium, High, and Very High, as shown in the table below.

The human rights risk assessment will be conducted by using the risk matrix, as shown below. The matrix is used to determine the importance of the human rights risks in 2 dimensions: Severity (Y-Axis) and Likelihood (X-Axis).

The severity of risks will be calculated based on the responses to the surveys sent to the relevant groups, and the risks will be mapped specifically for each group. The frequency and severity scores will be multiplied based on the responses to the surveys, and the magnitude of the risk will be determined specifically for each risk group. Mitigation actions will be evaluated based on the results for each risk topic;

Risk Rating		Description
	Very High (Salient issue)	Immediate action required to control the risk
	High	Action required to control the risk and monitoring closely
	Medium	Action required to control the risk
	Low	Action is advisable if it is more efficiency / No action required



Lists to be used for risk groups: personnel lists, stakeholder maps, customer maps, critical and strategic supplier lists.

Groups at Risk of Human Rights Issues

Our due diligence process recognizes specific groups that may be more vulnerable to human rights issues within our operations and value chain. These include:

Groups at Risks/ Related DD Process	ISO 45001	SA 8000	ISO 26000 /MAP360	ESIA / IFC	Ethical Hotline	Surveys
Scope	Joint ventures, power plants, electricity production business, electricity distribution process, contractors, subcontractors	Power plants and electricity production business	Critical suppliers	Power plants and electricity production business Electricity Distribution business	All stakeholders	All stakeholders, customers
Own employees	X	X	X	X	x	x
Women	X	X	X	X	x	x
Children				X		
Indigenous People			X			x

Migrant workers	X	X	X	X		
3 rd party employees	X	X	X	X	X	x
Local communities	X		X	x	x	x

By integrating these practices into our operations, we ensure compliance with our management system standards, including **ISO 45001**, as well as social responsibility standards **SA8000** and **ISO 26000**, safeguarding the rights of all stakeholders involved.

Our due diligence processes specifically address actual or potential human rights issues such as:

- Forced labor
- Human trafficking
- Child labor
- Freedom of association
- Right to collective bargaining
- Equal remuneration
- Discrimination

After the due diligence processes, the identified risk areas are investigated, and the findings are monitored through the QDMS platform and reported to senior management.

Human Rights Assessment Results

Regular human rights assessments are conducted to ensure ongoing compliance with our commitments and relevant standards that Zorlu Enerji implements. These assessments evaluate risks related to forced labor, freedom of association, right to collective bargaining, equal remuneration, discrimination and child labor, ensuring that our practices uphold the freedom of association and right to collective bargaining. We also review our policies to guarantee equal remuneration and to prevent discrimination. By aligning with our management system standards implementations; IFC, ESIA, ISO 45001, and social responsibility standards SA8000 and ISO 26000, our assessments help us continuously improve and maintain high standards for human rights within the organization.

	% of total assessed last three years	% of total assessed last three years where risks have been identified	% of risks with mitigation actions taken
Own Operations*	88	100	100
Contractors**	48	100	100
Joint Ventures	12	0	0

**Foreign operations in Palestine and Pakistan have been excluded (16/18). **In 2025 12 critical suppliers are assessed, so assessed suppliers' number are increased to 48. Means 3% coverage for all suppliers.*

The results of the human rights assessment are reported to the process owner and senior management according to the relevant procedure, mainly via QDMS actions. Findings related to the ESIA process are reported to the relevant financial institutions or government authorities in the ESIA progress report, while the evaluation results under the management systems (such as ISO 45001, SA 8000, ISO 26000) are shared with all interested parties upon management approval.

Findings and Risk Mapping

Groups at Risks	# of Stakeholders Engaged	Risk Areas Findings	# of Notifications	Magnitude
Employees	165	Working Condition	34	
		Discrimination	37	
		Forced Labor	18	
		Health & Safety	21	
		Rights to Collective Bargaining	62	
		Data Security & Privacy	25	
Customers	211 (OEDAŞ) 250 (OEPSAŞ)	Service Safety	30	
		Discrimination	26	
		Data Security & Privacy	28	
Suppliers & Contractors	12	Discrimination	4	
		Working Condition	1	
		Rights to Collective Bargaining	2	
Community	31	Health & Safety	1	

Prioritization for Medium and High-Risk Areas

Employees

Following a human rights risk assessment focused on our Zorlu Enerji employees, notifications received from the OEDAŞ electricity distribution business have highlighted collective bargaining rights, working conditions, and discrimination as key risk areas that require our attention.

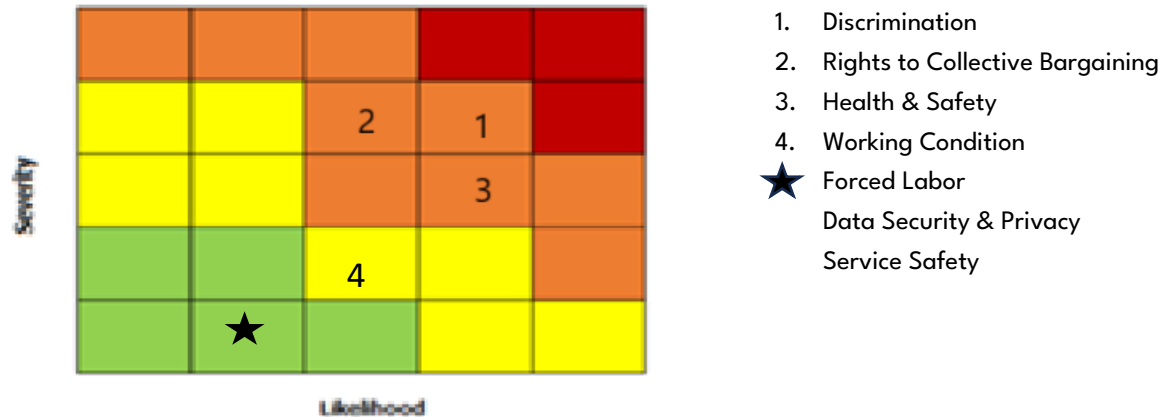
Suppliers & Contractors

During our human rights risk assessments of critical suppliers and contractors, a total of four reports were received related to discrimination. Three of these reports highlighted insufficient action regarding the number of employees with disabilities, while the fourth pertained to an ethical matter.

Community

Consultations were held with the communities in the regions where Zorlu Enerji's operations are carried out. Considering the findings, a risky area regarding health and safety was identified in the OEDAŞ electricity distribution region.

Risk Mapping Summary



Human Rights Mitigation & Remediation Actions

Processes Implemented to mitigate human rights risks

As Zorlu Enerji, we took a significant step in 2024 to proactively identify human rights risks. We reviewed and revised our Human Rights related policies that cover specific areas (Zorlu Holding Human Rights Policy, Zorlu Enerji Human Resources Policy, Zorlu Enerji Sustainable Supply Chain Policy, Zorlu Enerji Health & Safety Policy, Zorlu Enerji Social Responsibility Policy)

In 2025, we reviewed our human rights risk due diligence and risk assessment procedure and conducted a detailed risk assessment process for employees, suppliers, customers and stakeholders. As a result of detailed risk analyses conducted at our domestic and international stakeholders, we created a human rights risk map. This map showed us that topics such as Health and Safety and discrimination needed to be prioritized.

To address these risks, we will follow the situation more closely in 2025 and 2026 by holding one-on-one meetings with the stakeholders in problematic areas. Furthermore, to mitigate these risks, we will disseminate best practices and establish sustainable systems across the group. In 2026 we plan to arrange Human Rights Due Diligence Workshop with the participation of key stakeholders to understand the situations where human rights issues arise, the relationship between business activities and human rights, key human rights issues, and the importance of conducting business activities with consideration for human rights.

We are not only identifying risks but also working to create lasting solutions. In this context, we will come together with our local and international human rights experts to prepare our human rights due diligence policy and guidelines. This process will guide our corrective actions by clearly outlining our goals and standards.

To stay abreast of the best practices in our sector and contribute to discussions on human rights, we will continue to engage in constant dialogue through our membership in reputable platforms such as United Nations Global Compact.

Number of Sites with Mitigation Plans

Zorlu Enerji has created mitigation action plans for all 16 sites that were included in the human rights risk assessment process.

Remediation Action Process

As Zorlu Enerji, we acknowledge and are committed to the importance of preventing and effectively responding to human rights violations within our own operations and throughout our entire value chain. To this end, we implement the following key steps to ensure appropriate remediation:

- **Investigation:** If a case is reported through our grievance and notification mechanisms, an impartial and comprehensive investigation is conducted by our authorized departments, such as Legal, Human Resources, and the Ethics Committee, to determine the scope and nature of the violation.
- **Compensation and Restitution:** Those affected by the violation are entitled to receive both financial and non-financial compensation, depending on the nature of the situation. Should a perpetrator be identified, disciplinary action will be taken in accordance with the Company's rules.
- **Monitoring and Prevention:** Ongoing monitoring is essential to ensure the effectiveness of the remediation process. To minimize future risks and prevent potential violations, we will continue to promote a culture of respect for human rights and raise awareness throughout the company.

- **The Types of Remediation Actions Taken**

In the context of our monitoring and prevention efforts in 2025, we are strengthening our organization in occupational health and safety, specifically at OEDAŞ. We have provided training on discrimination and equality in addressing human rights risks that are important for our entire value chain and have conducted site audits as part of our SA8000 process. We have also launched the FutureFEM program. We have carried out audits and controls related to working environment conditions, and detailed investigations into notifications received via our ethics hotline are ongoing. At OEDAŞ, we have held discussions with personnel working under collective bargaining agreements and reviewed the terms of these agreements. In addition, we have conducted internal audits under ISO 27001 for data security and privacy policies, performed security and penetration tests, and revised our cookie policy based on the findings.