

KOÇSİSTEM

GIFTS AND ENTERTAINMENT POLICY

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1. PURPOSE AND SCOPE

The purpose of this Gift and Hospitality Policy ("**Policy**") is to determine the rules and standards to be followed when acting on behalf of KoçSistem, when receiving, giving, hosting guests or accepting a hospitality invitation and other similar activities.

All employees and managers of KoçSistem are obliged to act in accordance with this Policy, which is an integral part of Koç Group and KoçSistem Ethical Principles. KoçSistem expects all Business Partners to act in accordance with this Policy to the extent applicable to the relevant party and/or transaction and takes the necessary steps to ensure this.

2. DEFINITIONS

For terms used but not defined in this Policy, please refer to KoçSistem Anti-Bribery and Anti-Corruption Policy.

"Entertainment" consists of meals, lodging and accommodation, travel and transportation, sporting and cultural or other social events.

"Government/Public Official" broadly refers to a variety of individuals including but not limited to the following:

- Employees working at government bodies domestically or in a foreign country
- Employees of government business enterprises (domestic or in a foreign country)
- Employees of political parties, political candidates, (domestic or in a foreign country),
- Any person who holds a legislative, administrative or judicial position, (domestic or in a foreign country),
- Judges, jury members, or other officials who work at domestic, foreign or international courts,
- Officials or representatives working at national or international parliaments;
- Arbitrators resorted to, who have been entrusted with a task within the arbitration procedure, in order to resolve a legal dispute.

"Gift" means any item of value, whether given or received directly or indirectly, such as discounts, gift cards, promotions, promise of employment, cash, loans, memberships, services, favors, presents or goods.

"Business Partner" includes suppliers, distributors, dealers, authorized services and other third parties with whom the company has a business relationship and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of the company, as well as their employees and representatives.

. **“Politically Exposed Persons (“PEP”)”** refers to individuals who are currently or in the past, either domestically or in a foreign country, elected or appointed to an important public function; board members, senior executives and deputy executives of international organisations and other persons holding equivalent positions; senior politicians; senior officials of political parties; senior judicial, administrative or military officials; senior executives of state-owned enterprises; and the spouses, first-degree relatives (mother, father and children) and relatives of all such persons.

"Koç Group" means all companies directly or indirectly, individually or jointly controlled by Koç Holding A.Ş. and Koç Holding A.Ş., as well as the joint ventures included in the consolidated financial report of Koç Holding A.Ş. .

“Cash or Cash Equivalent” includes but not limited to money in cash, gift certificates, cards, discounts, securities, gold coins or fuel coupons or similar ticket compliments with specified value..

"KoçSistem" refers to KoçSistem Information and Communication Services Inc.

3. GENERAL PRINCIPLES

Gifts and Entertainment are commonly used to build and strengthen business relationships. However, they are legitimate tools only if they meet the following criteria:

- reasonable, infrequent and of modest value
- recorded in books and records in an accurate and transparent manner,
- in line with accepted business practices (no intention of Bribery, payoffs or kickbacks),
- in accordance with applicable legislation.

Any Gift or Entertainment may only be offered or accepted in good faith, while the intention behind such act and its potential effects should be carefully considered. All employees should ensure that providing or accepting any Gift or Entertainment:

- does not influence, or give the impression of influencing a business decision,
- will not be detrimental to Koç Group or KoçSistem if public becomes aware of such act,
- does not create a conflict of interest

All Gifts and Entertainments must comply with the above principles and KoçSistem Anti-Bribery and AntiCorruption Policy as well as the limits and detailed procedures set out in this Policy.

Approvals and adequate disclosures regarding Gift and Hospitality activities must be properly documented and the relevant transactions must be recorded in books and records in an accurate and transparent manner.

In case of any doubt as to whether any Gift and/or Hospitality activity is in compliance with this Policy, employees should consult KoçSistem Legal and Compliance Consultancy.

4. APPLICATION OF THE POLICY

4.1. Gifts

KoçSistem employees may neither offer or accept Gifts in Cash or Cash Equivalents. Gifts provided in the form of a service, or other non-cash benefits such as promotions, memberships, promises of employment or other forms of favors are not permissible under this Policy.

KoçSistem sets the value limit for offering/receiving Gifts from/to a single source¹ as USD 200 or equivalent annually. Regardless of the monetary limit, Gifts that may give the impression that they cause a conflict of interest or adversely affect fair and impartial judgement or are contrary to generally accepted business practices must be avoided.

When offering or accepting a Gift, if there is any doubt as to whether a Gift is considered customary and in line with business practices and this Policy, based on circumstances such as the frequency of events, the nature of the Gift or for any other reason, employees shall consult to the KoçSistem Legal and Compliance Consultancy may be consulted.

It is appropriate for employees to give/accept non-valuable Gifts in the course of their business. These may include Gifts such as calendars, key rings or other promotional items, preferably bearing the company logo. Gifts that are personal or could be perceived as personal should be avoided. Examples include an engraved watch or a pen with the recipient's initials.

Employees may only accept a Gift within the limits specified in this Policy and in accordance with general principles. When Gifts are given to employees that are not acceptable under this Policy, the Gift must be rejected by returning the Gift along with a note or e-mail referencing this Policy. Regardless of whether they accept or not, KoçSistem employees must provide appropriate information to KoçSistem Legal and Compliance Consultancy about the Gifts offered to them and/or offered to third parties by third parties.

4.2. Entertainment

Business meals and events are common practices in business life. KoçSistem and Business Partners can cover each other's meal, travel and accommodation expenses when they are actively working on a business project or conducting business activities. In such cases, the following criteria must be met:

- There must be a legitimate business interest in an ongoing or potential business relationship with the other party.
- The event must be one-off and not repeated on a regular basis.
- The event must not be excessive (the value or nature of the event is disproportionate to the

¹ The definition of "Single Source" covers each related parties, including but not limited to the customers, suppliers, authorized representatives, managers or staff of the same companies.

- business relationship) or take place in inappropriate venues.
- The Entertainment must not compromise fair and impartial judgement or create an impression as such.

Meals and other Entertainment that meet the above criteria may be appropriate.

Documentation of hospitality activities should include all details descriptive of the parties involved and the relevant business relationship (business reason), as well as descriptions and ancillary documents related to the event. The relevant expenses should be accurately and transparently recorded in the books and records under the expense accounts related to the business relationship.

Employees providing Entertainment are responsible for providing supporting documentation to be retained by the accounting department.

4.3. Interactions with Government Officials/PEPs

Interactions with Government Officials and PEPs are subject to strict regulatory requirements. Both local and international regulations prohibit giving anything of value to Government Officials or PEPs in order to obtain, retain or maintain business.

Providing Gifts or Entertainment to Government Officials and PEPs may raise Bribery concerns. Such Gifts and Entertainment must be modest, in accordance with relevant regulations and must not be perceived as a Bribe, payoff or kickback. In case of doubt, the officer or department in charge of compliance may be consulted.

5. AUTHORITY AND RESPONSIBILITIES

All employees and managers of KoçSistem are responsible for complying with this Policy and implementing and supporting KoçSistem's relevant procedures and controls in line with the requirements of this Policy. KoçSistem also expects and takes necessary steps to ensure that all its Business Partners to the extent applicable comply with and/or act in accordance with this Policy.

If there is a discrepancy between the local regulations, applicable in the countries where Koç Group operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local laws and regulations.

If you become aware of any action that you believe is inconsistent with this Policy, applicable law or the Koç Group or the KoçSistem Code of Ethics, you may seek guidance or report the incident to your line managers. You may alternatively report the incident to KoçSistem Legal and Compliance office directly or KoçSistem Ethics Hotline with anonymous reporting option via the following link: "koc.com.tr/hotline".

KoçSistem employees can consult KoçSistem Legal and Compliance Consultancy directly or via the address "uyummusavirligi@kocsistem.com.tr" regarding their questions regarding this Policy and its implementation. Violation of this Policy may result in significant disciplinary actions including dismissal, under the Employment Law

and other relevant legislation and the internal policies and regulations of KoçSistem. If this Policy is violated by third parties, their contracts may be terminated.

5 REVISION HISTORY

This Policy has entered into force with the decision of the Board of Directors dated 30.09.2021 and KoçSistem Legal and Compliance Consultancy is responsible for updating the Policy.

Revision	History	Explanation
No:1	01.09.2024	The definition of Politically Exposed Person ("PEP") is updated in accordance with the applicable legislation, the process for reporting the Gifts is added and expressions that cause ambiguities are improved