

KoçSistem

Sanctions and Export Controls Policy

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1. PURPOSE AND SCOPE

The purpose of this Sanctions and Export Controls Policy (the "**Policy**") is to set out the rules to be observed by KoçSistem in order to comply with economic sanctions and export control obligations.

Where relevant and applicable to its business activities, the Republic of Turkey, the United Nations ("UN"), the United States of America ("USA") and the European Union ("EU") ("**Turkey Sanctions**", "**UN Sanctions**", "**US Sanctions**" and "**EU Sanctions**", respectively") and fully complying with the economic sanctions and export control obligations imposed by other jurisdictions ("**Sanctions**") is one of the basic principles of KoçSistem.

All employees and managers of KoçSistem are ¹ obliged to act in accordance with this Policy, which is an integral part of Koç Group and KoçSistem Ethical Principles. KoçSistem expects its controlling shareholders and 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

"EU Sanctions" means the Sanctions adopted by the EU Council and implemented by the member countries.

"US Sanctions" means the Sanctions implemented by the U.S. State Department or the States.

"Embargo" means a general term that is used as a government prohibition against the export or import of all or certain products to a particular country for economic or political reasons.

"UN Sanctions" refers to economic sanctions imposed by the United Nations Security Council and implemented by U.N. member countries. All U.N. members are obliged to obey U.N. sanctions ²

"Export Control Regulations" means the laws and regulations that regulate and restrict the import, export and re-export of technologies, information, goods and services for reasons of commerce, foreign policy and national security..

"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

¹ For other relevant policies, please also refer to the KoçSistem Gift and Hospitality Policy and the KoçSistem Donation and Sponsorship Policy.

² <https://www.un.org/securitycouncil/sanctions/information>

"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 .

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

"OFAC" means the Office of Foreign Assets Control of the United States Department of the Treasury.

"Laundering of the Proceeds of Crime" means the activities that involve taking criminal proceeds and disguising their illegal source in anticipation of ultimately using such criminal proceeds to perform legal and illegal activities.

"Türkiye Sanctions" refer to the sanctions and embargoes that are imposed by the Republic of Türkiye and administered by the Ministry of Foreign Affairs.

"International Organization" means organizations that have international membership, scope or presence.

"Sanctions Target" means;

- Any individual, entity vessel or government which is a designated target of Sanctions ("Listed Persons") (e.g., OFAC and SDNs);
- Companies owned 50% or more, directly or indirectly, by a Listed Person;
- Individuals or companies that are resident, incorporated, registered or located in countries or territories such as Crimea, Donetsk, Luhansk and Sevastopol Regions of Ukraine, Cuba, Iran, North Korea and Syria that are subject to a comprehensive country or territory-wide Embargo as of the approval/revision date of this Policy (i.e., the "Embargoed Countries"), and
- means the governments of the Embargoed Countries or persons or³ companies owned or controlled by the Government of Venezuela or acting as agents thereof.

3. GENERAL PRINCIPLES

Governments and International Organizations may restrict the transfer or procurement of certain goods and services, technical data, information, materials and technology in accordance with the Sanctions and Export Control Regulations. For political, military or social reasons, certain countries, organizations or individuals may be subject to total or partial economic embargoes .

As a global company, KoçSistem aims to take effective and necessary precautions to manage the risks related to the Sanctions and Export Control Regulations

³ It is valid as of the date of approval of this Policy.

KoçSistem's products and services should not be traded directly or indirectly with Sanction Targets or Embargoed Countries. If the relevant business unit has any hesitation regarding the relevant transaction or in exceptional cases (eg.transacting with a party on the *Sectorial Sanctions Identifications List* ("SSI") in certain circumstances; Transactions in a sector that is not subject to the Embargoed Country and the Sanctions in certain cases, etc.), approval should be obtained from KoçSistem Legal and Compliance Consultancy when necessary to ensure that the relevant transaction does not violate the Sanctions or expose Koç Group to the risk of Sanctions.

It is of the utmost importance to KoçSistem to comply with all laws and regulations applicable to it, including Export Control Regulations and Sanctions, in the countries in which it operates and to fulfil its contractual obligations. Therefore:

- Unless the necessary arrangements are made and the required licenses are obtained³ any activity that is subject to Sanctions or any activity that constitutes a violation of applicable Export Control Regulations must be discontinued;
- If, during the course of Due Diligence, an activity that is prohibited, in violation of Sanctions or applicable Export Control Regulations is detected, the relevant process must be stopped immediately.
- Payments and collection of revenues shall be made and recorded in accordance with the laws and regulations of the countries in which the respective Koç Group company conducts its business activities.

Koç Group companies cannot be a party to the Laundering of Proceeds of Crime, terrorism and weapons of mass destruction financing activities. To this end, each Koç Group Company undertakes:

- Know who its customers and Business Partners are;
- Co Comply with applicable laws, regulations, the Koç Group and KoçSistem Code of Ethics and the related policies;
- Always ensure the accuracy of financial and business records;
- Ensures the accuracy of financial and business records;
- Keep records of all its activities in a secure and proper manner;
- Conduct Due Diligence in accordance with applicable regulations

Failure to comply with this Policy may result in, but is not limited to the following:

- Imprisonment of employees (as a result of violation of certain Sanctions);
- Significant financial penalties for KoçSistem employees;
- Adverse public reputation;
- Loss of business

- Termination of contracts;
- Impaired access to international financing;
- Recall of loans;
- Seizure of Koç Group's assets.

4. APPLICATION OF THE POLICY

Business and operations units are responsible for identifying potential risks associated with sanctions and export control regulations prior to establishing any permanent business relationship with a new Business Partner or customer. This process aims to ensure that the relevant party is not subject to sanctions and to identify potential compliance and reputational risks, including but not limited to corruption, bribery, money laundering, financing of terrorism or weapons of mass destruction, and human rights violations.

KoçSistem is responsible for conducting a prohibited parties screening ("Due Diligence Study") through appropriate screening tools, in full compliance with applicable data protection legislation in all jurisdictions in which KoçSistem operates.

Due diligence must be conducted not only prior to entering into a business relationship, but also on a regular basis throughout the duration of the relationship. If, at any stage, a violation of sanctions or export control regulations, or an indicator of other compliance risks (e.g., money laundering, financing of terrorism or weapons of mass destruction) is identified, the relevant unit must promptly inform KoçSistem Legal and Compliance Consultancy.

KoçSistem Legal and Compliance Consultancy may decide to suspend the transaction or initiate an Extended Due Diligence ("EDD") process regarding the relevant party. In such cases, the General Manager of KoçSistem is notified of the identified risks, the potential impact on KoçSistem, and recommendations regarding the initiation, continuation, or termination of the business relationship, including any mitigating measures.

The final decision regarding the commencement, continuation, or termination of the business relationship is made by the General Manager, taking into consideration the findings and recommendations set forth in the EDD report. All decisions approved by the General Manager are reported to Koç Holding Legal and Compliance Consultancy by KoçSistem Legal and Compliance Consultancy. The entire process may be subject to internal audit where necessary.

In cases of uncertainty regarding the appropriate course of action, the relevant units or compliance officers are expected to consult with Koç Holding Legal and Compliance Consultancy.

When entering into a contract with a Business Partner, KoçSistem ensures that the counterparty is informed of this Policy and agrees to comply with its provisions. Furthermore, KoçSistem reserves the right to unilaterally terminate the agreement or impose other appropriate sanctions in the event of any breach of this Policy.

5. INSULATION OF CERTAIN PERSONS FROM PROCEEDINGS

In certain circumstances, employees who are nationals of a U.S. Person, a European Union member state, or the United Kingdom may be restricted from participating in commercial activities involving embargoed countries, even if such activities have been approved by KoçSistem Legal and Compliance Consultancy.

The term "**US Person**" includes anyone who is in the United States; any U.S. citizen or green card holder (including dual citizens of the U.S. and another country), wherever located; companies incorporated in the U.S.; or companies controlled by U.S. companies, even if incorporated outside the U.S.

For more information regarding the isolation of certain individuals, you can contact KoçSistem Legal and Compliance Consultancy.

6. INFORMATION REQUESTS

KoçSistem may receive information requests from its banking partners or correspondent banks through various channels, such as email or fax, regarding specific transactions, counterparties, or matters falling within the scope of economic sanctions and export control regulations. Any employee receiving such a request is required to immediately forward it to KoçSistem Legal and Compliance Consultancy without delay.

Responses to these requests must be prepared in a manner that ensures accuracy and completeness, and must not contain any misleading or inaccurate information. If necessary, the preparation of responses should be carried out in consultation with Koç Holding Legal and Compliance Consultancy, under the guidance of the relevant compliance function.

All related internal correspondence, as well as supporting and evidentiary documentation, must be recorded and archived electronically by KoçSistem Legal and Compliance Consultancy in accordance with internal procedures.

In case of any uncertainty or hesitation regarding such matters, KoçSistem Legal and Compliance Consultancy should be contacted for clarification and guidance.

7. AUTHORITY AND RESPONSIBILITIES

All KoçSistem employees and managers are accountable for adhering to this Policy and for effectively implementing and supporting the associated procedures and internal controls in accordance with its requirements. KoçSistem also expects its Business Partners to comply with

this Policy to the extent applicable to the specific party and transaction, and takes the necessary measures to ensure such compliance.

In cases where a conflict arises between this Policy and the local laws applicable in jurisdictions where KoçSistem operates, the more stringent provision shall prevail, provided that its implementation does not conflict with mandatory local legislation.

If you become aware of any behavior or action that you believe violates this Policy, applicable laws, or the Ethical Principles of Koç Group or KoçSistem, you are encouraged to raise the matter with your line manager. Alternatively, concerns may be reported in writing to KoçSistem Legal and Compliance Consultancy, the Internal Audit Unit, or Human Resources via the reporting channel at **koc.com.tr/ihbarbildirim**.

KoçSistem employees may also contact KoçSistem Legal and Compliance Consultancy at uyummusavirligi@kocsistem.com.tr for any questions or concerns regarding the content or implementation of this Policy.

Violations of this Policy by employees may lead to disciplinary measures, up to and including termination of employment. In cases where a third party—expected to comply with this Policy—acts in breach of its provisions, KoçSistem reserves the right to terminate the relevant contractual relationship.

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8. 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	Comment
No:1	01.09.2023	Application of the Policy has been revised by clarifying the Due Diligence process, the expressions that cause ambiguities are improved.