



Yapı ve Kredi Bankası A.Ş.
Donation and Sponsorship Policy

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1 PURPOSE AND SCOPE

The purpose of this Donation and Sponsorship Policy (the “**Policy**”) is to set standards, principles and rules to be complied with, while making donations and providing sponsorships in Yapı Kredi Bankası A.Ş. (“Yapı Kredi”) In line with our strong belief that contributing to the community is the vital foundation for building successful business, Yapı Kredi sees donations and sponsorships as a way to support the communities in jurisdictions where it operates.

All employees, directors, officers of Yapı Kredi shall comply with this Policy, which is an integral part of Koç Group Code of Ethics and Yapı Kredi Code Of Ethics and Business Conduct Policy and Anti-Bribery and Anti-Corruption Policy

2 DEFINITIONS

“**Donation**” means voluntary contributions in money or in kind (including goods or services etc.) to individuals or charitable entities (such as foundations, associations and other nonprofit organizations); universities and other schools; and other private or public legal entities or organizations etc. to advocate a philanthropic cause, serve the public interest and help achieve a social goal, without a consideration received in return.

“**Koç Group**” means Koç Holding A.Ş. and companies which are controlled directly or indirectly, jointly or individually by Koç Holding A.Ş. and the joint venture companies listed in its consolidated financial report.

“**Sponsorship**” means contribution in money or in kind (including goods, or services, etc.) given to an entity or group, for staging an artistic, social, sports or cultural activity etc. in return for an institutional benefit reflected in the form of visibility to target audiences, under a sponsorship agreement or whatsoever name, to the extent the nature of the relationship is as defined herein.

3 GENERAL PRINCIPLES

While making Donations and providing Sponsorships, Yapı Kredi ensures that:

- it complies with its incorporation documents (including but not limited to its articles of association), and the restrictions and limits set forth by its General Assembly and/or the Board of Directors or similar body in accordance with the provisions of the Banking Law;
- it complies with all applicable legislation in the jurisdictions where it operates; including but not limited to relevant capital markets legislation, banking legislation, commercial code, and tax laws to the extent applicable;
- It should be documented in accordance with the regulation;
- the Donation and/or the Sponsorship is
 - o not in conflict with the values or business interests of Yapı Kredi and is in conformity with the principles described herein and in the Yapı Kredi Code of Ethics and Business Conduct and Anti-Bribery and Anti-Corruption Policy;
 - o properly documented and never in exchange for obtaining an improper advantage or benefit or used for the purpose of any form of corruption;
 - o not offered in connection with any bid, contract renewal or business opportunity;
 - o not made for political purposes to any politician, political party or political groups, a municipality or government official, either directly or indirectly via third party;
 - o not for the benefit to any entity or organization, which discriminates, based on ethnicity, nationality, gender, religion, race, sexual orientation, age or disability or

- not directly or indirectly used for human or animal rights' violations, promotion of tobacco, alcohol and illegal drugs and damaging the environment.

Yapı Kredi shall also ensure that the upper limit for donation is determined by the General Assembly in accordance with the provisions of the Banking Law and the Donations granted during the year shall be submitted to the General Assembly.

4 APPLICATION OF THE POLICY

If it is the first time that Yapı Kredi conducts a Donation or Sponsorship transaction in favor of any third party, for this purpose: i)if an agreement or an undertaking is required to be signed by authorized persons according to the relevant company's signature circular and / or company's articles of association ii.) If it is not necessary to sign a contract and commitment, the following steps must be completed before the transaction can be carried out:

- For the corporate image and brand impact assessment of donations and sponsorship requests from inside and outside the institution, details of the planned request and information about the relevant parties (name, address, senior management, etc.) are transferred to the Corporate Communication Management by the requesters.
- In a purpose to make the necessary evaluations within the scope of anti-bribery and anti-corruption, Corporate Communications Management fills in the due diligence questionnaire regarding the requests it deems appropriate with the information it obtains and sends it to the Anti-Bribery and Anti-Corruption Officer.
- Requests that are deemed appropriate to be evaluated within the framework of compliance the regulation and issues regarding the anti-bribery and anti-corruption, are submitted for final approval of the management or the board in line with the Yapı Kredi's Internal Directive in force.
- Upon completion of the processes described above, any Donation or Sponsorship that may have a material impact over Koç Group brand and corporate image, shall also be notified to Koç Holding Corporate Brand Communications and Sponsorship Department by the relevant Koç Group company prior to board approval or execution;
- For sponsorships, the parties shall enter into a written agreement detailing all the conditions;
- For sponsorships, sponsored entity, must provide the Corporate Communication Management post-event documentation (i.e. photos, videos or a report etc. as may be relevant) or any other documents or materials evidencing compliance with the sponsorship agreement as soon as practically possible after the completion of the sponsored event or project. If, however, the sponsored event is a recurrent event, the sponsorship agreement shall set forth the content and the frequency of reporting.)
- Supporting documents such as receipts and invoices must be kept by the accounting department and transactions must be booked in accordance with the relevant legislation;
- All Donations and Sponsorships shall be notified to the Compliance, Internal Control and Risk Management
- Due Diligence, approval, execution and follow-up processes shall be documented to be used for audit and compliance review where necessary; and
- A report listing Donation and Sponsorship activities (including purpose, entity and due diligence results) shall be sent to Legal and Compliance Department in Koç Holding, on an annual basis.

5 AUTHORITY AND RESPONSIBILITIES

All employees and directors of Yapı Kredi are responsible for complying with this Policy, implementing and supporting the relevant Yapı Kredi's procedures and controls in accordance with the requirements in this Policy.

If there is a discrepancy between the local regulations, applicable in the countries where Yapı Kredi operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.

Communication channels of ethics, established to report those who breach Code of Ethics and the suspicious or worrying incidents which shall impair our prestige, and/or to consult questions about the implementation of this Policy are specified below:

| Responsible Business Unit | Communication channels |
|---|--|
| Compliance, Internal Control and Risk Management Ethics, Anti-Corruption and Conflict of Interest Department | 0(212) 339 73 53 etik@yapikredi.com.tr Yapı ve Kredi Bankası A.Ş., Head Office D Block |
| | 0(212) 339 73 30 YolsuzluklaMucadele@yapikredi.com.tr Yapı ve Kredi Bankası A.Ş., Head Office D Block |
| | 0(212) 339 60 39 CikarCatismasi@yapikredi.com.tr Yapı ve Kredi Bankası A.Ş., Head Office D Block |

Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

6 REVISION HISTORY

This Policy takes effect on March 02, 2021 upon approval of the Board of Directors of Yapı Kredi Bankası A.Ş., and submitted to the General Assembly of Yapı Kredi Bankası A.Ş.

This Policy is maintained by the Compliance, Internal Control and Risk Management in Yapı Kredi. All material amendments hereto shall be approved by the Board of Directors and submitted to the General Assembly of Yapı Kredi Bankası A.Ş. for review.

| Revision | Date | Comment |
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