

	Donation and Aid Policy			
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**DONATION AND AID POLICY OF
AKFEN İNŞAAT TURİZM VE TİCARET ANONİM ŞİRKETİ
(the “COMPANY”)**

1. Purpose

The purpose of the donation and aid policy is to determine the donation and aid principles of the Company in full compliance with the regulations applicable to the Company and the provisions of the Articles of Association.

The Company complies with the Capital Markets Law No. 6362 (“CML”), the Turkish Commercial Law No. 6102 (“TCL”), the capital markets legislation and other relevant legislations and regulations regarding donations and aid. The Company pays maximum attention to implementing the rules outlined in the Corporate Governance Principles described in the applicable Corporate Governance Communiqué of the Capital Markets Board (“CMB”), which may be amended and modified from time to time.

The Donation and Aid Policy of the Company was prepared in accordance with the CMB's Corporate Governance Communiqué (II-17.1) and the Dividend Communiqué (II-19.1) and communicated to all shareholders as well as all other stakeholders through the website of the Company.

2. Authorization and Responsibility

The Donation and Aid Policy was prepared by the Board of Directors within the framework of the CMB's Corporate Governance Principles and submitted to the shareholders for approval as a separate item on the agenda of the general assembly meeting of the Company. The monitoring, supervision, improvement and necessary updates of the Donation and Aid Policy of the Company are under the authorization and responsibility of the Board of Directors. Any changes to be made to the Donation and Aid Policy are submitted to the shareholders for approval at the general assembly meeting following the decision to be taken by the Board of Directors and published on the website of the Company.

3. Donation and Aid Principles

As described in the Article 3 of the Articles of Association of the Company entitled "Purpose and Subject":

"The Company may provide aids and donations to the organizations that are included in the general budget, annexed-budget institutions, special provincial administrations, foundations established for social purposes, associations, national and international organizations, institutions and organizations engaged in scientific researches and development activities, universities, educational institutions and similar persons or institutions in line with its own purposes and subject, provided that the donations do not constitute a violation of the concealed gain transfer regulations of the capital markets legislation, the necessary explanations required in special cases under the capital markets legislation are made to ensure that investors are properly informed, the donations made within the year are presented to the shareholders at the general assembly and the donations to be made are added to the distributable profit base; and the Company may become a member of associations and participate in foundations. It may not make donations in excess of the cap determined by the General Assembly”.

It is possible for our Company to make donations under the above-mentioned provision in the Articles of Association and it is prescribed in the Articles of Association that the cap of the donation to be made will be determined by the general assembly. Donations and aids to the detriment of the rights of the shareholders of the Company will be avoided. However, within the framework of social responsibility approach, donations and aids that are deemed convenient by the Board of Directors may be made in line with the purpose and subject of the Company in accordance with the provisions of the capital markets legislation and the policies and practices of the Company. Donations and aids may be made in cash or in kind to any natural person or legal entity.



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The donations and payments to be made by the Company within the framework of the above-mentioned provision of the Articles of Association are communicated to the public according to the CMB's regulations regarding public disclosure of special cases. The amount and recipients of all donations and aids made within the relevant period as well as all policy changes are notified to the shareholders as a separate agenda item at the general assembly meeting. It is mandatory to provide information to the shareholders about donations and aids at the ordinary general assembly.

In connection with donations and aids, the provisions of the relevant legislation including the CMB's regulations regarding the prohibition of concealed gain transfer and the mandatory corporate governance principles are followed.