

## AKMERKEZ GYO ETHICS POLICY

As Akmerkez, we host many "firsts" with carefully considered details for our visitors and guests. We place importance on sustainability and shape our activities with the aim of being one of these "firsts." In line with our corporate governance principles and sustainability approach, we are committed to ensuring that interactions and communication among our stakeholders are healthy, accountable, transparent, and based on trust. In accordance with the Ethics Policy we have developed, we are committed to:

- Complying with the requirements of the laws, regulations, and standards to which we are subject,
- Protecting human and employee rights and freedoms,
- Adhering to the principles of honesty, equality, and confidentiality,
- Providing our stakeholders with complete and accurate information in a transparent manner,
- Taking a stand against using the company's name, title, or authority for personal gain,
- Informing our employees about the importance of representing our brand and company in the best possible way and avoiding situations, attitudes, and events that could lead to reputational damage,
- Opposing employees accepting high-value gifts, engaging in personal benefit activities such as excessive hospitality that goes beyond the purpose of the business, engaging in bribery and corruption, or entering into financial relationships with suppliers,
- Encouraging the use of the Ethics Hotline (0850 202 66 15, akkok@kpmg.com.tr), a
  notification channel specially established for such purposes in our company, for
  reporting violations of the Ethics Policy. Reports made through this channel are directly
  forwarded to the Ethics Committee for evaluation. We commit to protecting the
  confidentiality of the person making the report, ensuring that they are not subject to
  punishment, loss of rights, retaliation, or negative treatment, and applying the
  necessary sanctions and punishments for malicious false reports. At the same time, we
  will safeguard the right of the person subject to the report to defend themselves,
- Sharing our policy publicly through our corporate website and informing all stakeholders through this channel,
- Ensuring that all employees have a role in the effective implementation of the Ethics Policy, with the responsibility resting with the Ethics Committee, reviewing the policy and management system at least once a year, and making improvements and updates as necessary,
- Enforcing this policy with the approval of the Board of Directors.