



KOÇZER COMMUNITY INVESTMENT POLICY

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1. PURPOSE AND SCOPE

The purpose of this Community Investment Policy (“**the Policy**”) is to put forward the principles to adopt while developing community investment initiatives. Zer Merkezi Hizmetler ve Ticaret A.Ş. (“KoçZer”) recognizes the impact of its operations on its stakeholders, the environment, and community at large and emphasizes significance of sustainable development.

This Policy, which is an integral part of the Koç Group Code of Ethics and KoçZer Code of Conduct¹, is developed to demonstrate KoçZer’s commitment to making a positive impact on the welfare and sustainable development of related communities and the environment engaged with as a corporate citizen.

KoçZer is committed to conducting business in conformity with the highest ethical standards. As a signatory to the UN Global Compact², Koç Holding A.Ş. complies with, and as part of Koç Group, KoçZer acts in compliance with, the UN Global Compact’s 10 Principles.

As part of Koç Group, KoçZer and this Policy adopt Koç Holding’s sustainability approach “Lead. Together” as well as Koç Group Sustainability Guide³.

2. DEFINITIONS

“**Community Investment**” means strategic involvement in, and partnership with organizations or individuals, to address a range of social and environmental issues defined by the KoçZer to contribute to its long-term corporate interests and to enhance its reputation.”

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

“**The Sustainable Development Goals**” are the 17 Goals adopted by all UN Member States as part of the 2030 Agenda for Sustainable Development, which set out a 15-year plan to achieve the Goals, addressing global challenges including those related to poverty, inequality, climate, environmental degradation, prosperity, and peace and justice⁴.

“**The UN**” means the United Nations.

“**The UN Global Compact**”⁵ is the pact based on the universally accepted declarations of the UN on the fields of social responsibility and sustainability practices, addressing 10 fundamental responsibilities of business in the areas of human rights, labor, environment and anti-corruption.

¹ Please refer to KoçZer Code of Ethics for details.

² <https://www.unglobalcompact.org/what-is-gc/mission/principles>

³ <https://www.koc.com.tr/sustainability>

⁴ <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

⁵ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

3. AUTHORITY AND RESPONSIBILITIES

This Policy is to provide guidance in developing Community Investment initiatives for all employees and directors of KoçZer. If you notice any action you believe to be inconsistent with this Policy, you may seek guidance from Human Resources and Corporate Communication Department.

The Human Resources and Corporate Communication Department is responsible for updating the Policy.

4. GENERAL PRINCIPLES

KoçZer conducts "Due Diligence"⁶ on organizations or individuals that are supported by KoçZer, in order to ensure that Community Investments are met by the reliable parties with sound purposes.

KoçZer ensures that Community Investments, abide by KoçZer Code of Conduct, Human Rights Policy, Donations and Sponsorship Policy, Anti-Bribery and Corruption Policy and other relevant policies.

Applying for memberships of the regional, national, or international organizations, or being signatory to agreements related to Community Investments require ensuring compliance with the UN Global Compact Principles as it may affect KoçZer's or Koç Group's reputation.

5. APPLICATION OF THE POLICY

In line with Koç Group Sustainability Guide⁷, as part of Koç Group, KoçZer consider the following while making Community Investments:

- whether the relevant Community Investment is compatible with the priorities and needs of the regions where business activities are carried out,
- Providing a clear connection between Community Investment activities and business strategy,
- Establishing strong partnerships with civil society organizations, international organizations, universities or individuals in order to put forward applicable solutions,
- Ensuring that the objectives and results of the Community Investments are measurable and scalable by design, and the results have the potential to be disseminated across other businesses and regions, and
- Ensuring that they are aligned with the social and environmental goals, as mentioned in the UN Sustainable Development Goals.

⁶ Please refer to the Sanctions and Export Controls Policy.

⁷ <https://www.koc.com.tr/sustainability>.