

DONATIONS AND AID POLICY

1. PURPOSE AND SCOPE

The purpose of this Policy is to establish the principles governing donations and aid that may be provided by KÂR Katılım Altın Rafinerisi A.Ş. ("the Company") in a lawful, ethical, transparent, properly documented and accountable manner.

This Policy aims to ensure that donations and aid serve a public benefit, are not used as a means of providing an improper benefit or influencing decisions, and are consistent with the Company's corporate values.

This Policy applies to cash and in-kind donations, humanitarian aid, social contributions and other support provided without consideration, whether made directly by the Company or through third parties.

Sponsorships involving commercial consideration or advertising or promotional rights are, as a rule, outside the definition of donations under this Policy. Nevertheless, such sponsorships shall be conducted in accordance with the provisions relating to ethical assessment, conflicts of interest, record-keeping and approval.

Members of the Board of Directors, managers, employees and third parties involved in donation or aid processes on behalf of the Company shall comply with this Policy.

2. FUNDAMENTAL PRINCIPLES AND OUR COMMITMENTS

The Company adopts and commits to the following principles in its donation and aid activities:

- To make donations and provide aid in accordance with applicable legislation, the Company's ethical and anti-corruption principles, and the approval of the Board of Directors.
- To prioritise initiatives that provide public benefit in the fields of education, science, health, culture, arts, the environment, humanitarian relief, disaster response, social solidarity and sustainable development.
- To ensure that no donation or aid is intended to secure business, influence a licence or permit process, improperly influence a public official or private-sector decision-maker, or obtain an unfair advantage.
- Not to make donations or provide aid on behalf of the Company to political parties, political candidates or election campaigns.
- To conduct due diligence on the recipient's legal existence, purpose of activities, authorised representatives and related persons, reputation, and sanctions and money laundering risks, in proportion to the nature and amount of the donation.

- To require persons with a conflict of interest to withdraw from the assessment and approval process and to disclose any relevant personal or close relationship.
- As a rule, to make donations and provide aid through a bank account held in the recipient's name or through a verified method of in-kind delivery, and to avoid cash payments except in duly justified and documented exceptional circumstances.
- To maintain complete records of the purpose, amount, recipient and approval of each transaction, together with proof of payment or delivery and the necessary due diligence records.
- Not to split transactions, present them under different descriptions or make indirect payments through third parties for the purpose of circumventing applicable approval requirements.
- To monitor whether a donation is used for its intended purpose through documents, reports, confirmations or site visits, in proportion to the relevant risk and amount.
- To apply expedited approval procedures authorised by the Board of Directors to facilitate rapid assistance in disasters and emergencies, and to submit the relevant transactions for information at the first subsequent meeting of the Board of Directors.
- To observe the principles of accuracy, beneficiary privacy, personal data protection and proportionality appropriate to the nature of the donation in any public disclosure.

3. DUTIES AND RESPONSIBILITIES

- The Board of Directors approves the Policy and makes decisions regarding donations and aid.
- General Management evaluates donation proposals and oversees their implementation within the scope of the authority granted by the Board of Directors.
- The function responsible for financial affairs or accounting verifies the relevant approvals and supporting documents, records the transactions in the accounts and ensures the retention of the relevant records.
- The compliance function supports recipient due diligence, conflict-of-interest, anti-corruption, sanctions and money laundering controls for higher-risk donations or donations requiring additional review.
- The function proposing or managing a donation provides justification for the appropriateness of its purpose and beneficiary and obtains the relevant delivery and use documentation.

- All employees immediately report any request for or offer of an improper benefit presented as a donation or aid.

4. MONITORING, RECORD-KEEPING AND FEEDBACK

4.1. Monitoring and Record-Keeping

- Donations and aid are monitored through a central register that records the recipient, purpose, amount, approving authority, method of payment or delivery and monitoring outcome.
- Donations and aid provided by the Company are reported collectively to the Board of Directors at least annually. Higher-risk or unusual transactions are additionally reported without delay.
- Transactions suspected of violating this Policy are suspended and referred for review through the relevant ethics, compliance, internal control or other necessary review processes.

4.2. Feedback

Reports involving suspected ethical violations or nonconformities, as well as questions, concerns or feedback regarding this Policy, may be submitted through the following communication channels:

Ethics and Whistleblowing Reports: etik@karaltinrafinerisi.com

Web Form: Ethics and Compliance Violations Reporting Form

Address: Yarımburgaz Mah., 1. Cumhuriyet Cad. No: 50, İç Kapı No: 1,
Küçükçekmece / İstanbul / TÜRKİYE

Reports are assessed in accordance with the principles of confidentiality, impartiality, personal data protection and protection against retaliation. No adverse action against any person who makes a report in good faith shall be permitted.

5. BREACHES AND SANCTIONS

Conduct contrary to this Policy, the Company's policies and procedures, ethical principles or applicable legislation shall be deemed a breach. Necessary administrative, disciplinary, contractual and/or legal action shall be taken by considering the nature, severity, recurrence and impact of the breach and the status of the relevant party.

For employees, appropriate disciplinary and administrative action shall be taken in accordance with applicable labour legislation, employment contracts, ethical principles and relevant internal Company rules. For third parties, suppliers, customers, business partners, service providers and consultants, necessary action, including suspension, restriction or termination of the business relationship, shall be

taken in accordance with the relevant contractual provisions, commitments and Company procedures.

Depending on the nature of the breach and the applicable legislation, the competent authorities shall be notified, regulatory reports shall be submitted or judicial/administrative authorities shall be contacted where necessary. The Company shall not tolerate retaliation against any person who reports a concern in good faith.

In situations that give rise to, or may potentially give rise to, a conflict of interest, employees, managers, members of the Board of Directors and relevant parties acting on behalf of the Company are required to disclose such situation in a timely manner and in writing. Conflict of interest declarations shall be obtained at least annually and on an event-driven basis through the Conflict of Interest Declaration Form; declarations received shall be recorded, monitored and retained confidentially by the Internal Control and Supply Chain Compliance Officer in the Conflict of Interest Declaration Register.

6. PUBLICATION AND TRANSPARENCY OF THE POLICY

This Policy is published and made accessible to relevant stakeholders through the Company's official website and appropriate communication channels. In line with the principle of transparency, the Company undertakes to keep the Policy publicly available, accessible and up to date.

Related Documents:

- Anti-Bribery and Anti-Corruption Policy
- Anti-Money Laundering and Counter-Terrorist Financing Policy
- Ethical Principles and Code of Conduct
- Whistleblowing Policy
- Ethics and Compliance Violations Reporting Form
- Conflict of Interest Declaration Form
- Conflict of Interest Declaration Register

7. APPROVAL AND EFFECTIVENESS

This Policy was approved by the Board of Directors on 11/08/2026 and entered into force on the same date.

The Policy is reviewed by the responsible function at least once a year and additionally whenever there is a material change in applicable legislation, standards, the organisational structure, activities or the Company's risk profile.

In the event of any inconsistency, conflict or difference in interpretation between the English translation of this Policy and the Turkish text, the Turkish text shall prevail.

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