

COMPLIANCE

Regenerated for All

GLOBAL DONATION POLICY

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1. GENERAL PRINCIPLES

Donations to third parties, including but, not limited to social, cultural or educational non-governmental organizations or associations must be granted with the intent of voluntary contributions and without expecting any counter benefit.

As a general principle, prior to taking a decision to make donations, proper due diligence procedures must be exercised about the prospective donation recipients.

To avoid taking risk and protecting the interests of Arçelik's stakeholders, comprehensive information pertaining to the realized donations must be documented and the shareholders must be debriefed during the general assembly meetings at least on an annual basis. If it is required by the local law of the country that Arçelik operates, the types and amounts of donations can also be announced to the public under material disclosures.

Donations can be granted in cash or by commodities produced or owned by Arçelik.

Donations must fully comply with the hidden income transfer regulations.

2. BAN ON POLITICAL DONATIONS

No donation can be made to political parties, politicians or political candidates for political duties. Arçelik may not allocate or provide the Company's assets or resources (vehicles, computers, e-mail, etc.) for political activities.

3. THE PROCESS

The decision making of granting donations must include proper due diligence procedures conducted by the respective Compliance Officer. Information about corporate background, beneficial owners, adverse press from public domain must be examined for this due diligence procedure - where applicable and possible. Sanctions, High Risk Entities list, Politically Exposed Persons list must be screened by relevant Compliance Officers

Board of Directors and the General Manager of the country where the donation is going to be made remain liable from the risks created from the donation. Decisionmakers must always keep in mind the followings:

- Arçelik's social responsibility principles must always be considered and followed.
- Supporting documents such as invoices or delivery receipts are required to be in place.
- Transactions are booked to proper accounts which are used for charity and donation expenses accurately and transparently in accordance with the local laws and regulations of the countries that Arçelik operates.

DONATION VALUE	APPROVAL PROCESS
<p align="center">Exceeding amounting equivalent value of USD 10,000</p>	<p>Assistant General Manager and Global Arçelik CFO's' conjoint approvals are prerequisite prior to taking approval from the Board of Directors, which are responsible from the country of operations where the donation is going to be made or granted. CEO and Accounting Director must be informed.</p>
<p align="center">Under USD 10,000</p>	<p>Joint approvals of Global Communication Director and Finance Director of Arçelik are prerequisite. Country Manager, CEO, CFO and Accounting Director must be informed.</p>

4. ROLES AND RESPONSIBILITIES

Global Donation Policy is published by Arçelik Global Communications Department, and the Company is responsible for ensuring the compliance with the Policy by all its employees. Any violation of this Policy will result in disciplinary action, up to and including termination of employment.

In addition, regarding the Company's position for corrective and/or preventative actions against any non-compliant behaviors should be considered regularly via related parties.

Compliance Officers are employees of the Company appointed by Chief Legal and Compliance Officer as being responsible for monitoring the Company's operations pertaining to this Policy.

This Policy will be periodically reviewed by the assigned Arçelik Global Communications Department to ensure compliance with new or revised laws and regulations.

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