



COMPLIANCE

**GLOBAL DONATION AND
SPONSORSHIP POLICY**

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1. PURPOSE AND SCOPE

The purpose of this Donation and Sponsorship Policy (the “**Policy**”) is to set standards, principles and rules to be complied with by Arçelik and its Group Companies, while making Donations and providing Sponsorships. In line with our strong belief that contributing to the community is the vital foundation for building successful business, Arçelik and its Group Companies see Donations and Sponsorships as a way to support the communities in jurisdictions where they operate.

All employees, directors, and officers of Arçelik and its Group Companies, as a Koç Group company, shall comply with this Policy, which is an integral part of Arçelik Global Code of Conduct. Arçelik and its Group Companies also expect and take necessary steps to ensure that all of its Business Partners - to the extent applicable - comply with and/or acts in line with it.

2. DEFINITIONS

“**Business Partners**” include suppliers, distributors, authorized service providers, representatives, independent contractors and consultants.

“**Donation**” means voluntary contributions in money or in kind (including goods or services etc.) to individuals or charitable entities (such as foundations, associations and other nonprofit organizations); universities and other schools; and other private or public legal entities or organizations etc. to advocate a philanthropic cause, serve the public interest and help achieve a social goal, without a consideration received in return.

“**Group Companies**” means the entities of which the Company holds directly or indirectly more than 50% of share capital.

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

“**Sponsorship**” means contribution in money or in kind (including goods, or services, etc.) given to an entity or group, for staging an artistic, social, sports or cultural activity etc. in return for an institutional benefit reflected in the form of visibility to target audiences, under a Sponsorship agreement or whatsoever name, to the extent the nature of the relationship is as defined herein.

3. GENERAL PRINCIPLES

While making Donations and providing Sponsorships, Arçelik and its Group Companies ensure that:

- They comply with its incorporation documents (including but not limited to its articles of association), and the restrictions and limits set forth by the General Assembly and/or the Board of Directors or similar body of Arçelik and its Group Companies;

- They comply with all applicable legislation in the jurisdictions where Arçelik and its Group Companies operate; including but not limited to relevant capital markets legislation, commercial code, and tax laws to the extent applicable;
- They do not conflict with the values or commercial interests of Arçelik and its Group Companies and comply with the principles in this Policy and Arçelik Global Code of Conduct.
- Donations and Sponsorships should be documented in accordance with the legislation.
- Donations and Sponsorships can be granted in cash or by products produced or owned by Arçelik and its Group Companies.

The Donation and/or the Sponsorship is

- properly documented and never in exchange for obtaining an improper advantage or benefit or used for the purpose of any form of corruption;
- not offered in connection with any bid, contract renewal or business opportunity;
- not made for political purposes to any politician, political party or political groups, a municipality or government official, either directly or indirectly via third party¹;
- not for the benefit to any entity or organization, which discriminates, based on ethnicity, nationality, gender, religion, race, sexual orientation, age or disability or
- not directly or indirectly used for human or animal rights' violations, promotion of tobacco, alcohol and illegal drugs and damaging the environment.

In addition to the above listed conditions, Arçelik A.Ş. -as a listed company in Turkey- shall also ensure that the upper limit for Donations is determined by the General Assembly and the Donations granted during the year shall be submitted to the General Assembly.

4. IMPLEMENTATION

If it is the first time that a Donation or Sponsorship transaction is made by Arçelik and its Group Companies in favor of any third party, the following steps should be completed before signing a contract and commitment by authorized persons according to the relevant company's signature circular and / or company's articles of association:

- If the transaction initiated by a department other than the department responsible for brand communication and Sponsorships, a written proposal containing a description of the planned use for the funds and information regarding the relevant entity (name, address, senior management) shall be submitted to the Global Communications Department for a corporate image and brand impact assessment via Sponsorship and Donation evaluation form. (If the relevant transaction is carried out by a department responsible for company brand communication and Sponsorships, it is excluded from this process. Example: Our company sponsors a football team with the Beko brand).
- Global Communications Department conducts preliminary examination and due diligence² about the party within this scope, and examines corporate history, information about stakeholders and negative news from public sources for preliminary examination;

¹ Please see Arçelik Global Code of Conduct and Global Anti-Bribery and Corruption Policy.

² Due diligence shall be conducted as per Arçelik Global Sanctions and Export Control Policy and Global Anti-Bribery and Corruption Policy. To the extent required, relevant documentation shall be shared with other departments (including legal, tax and capital markets compliance review).

- If the request and the result of the evaluation are evaluated positively, the process for Donations is followed in accordance with the approval table specified below.
- However, in the event of a Donation or Sponsorship transaction that may have a material impact over the Koç brand and Koç Group corporate image, in addition to the steps above, the request must be notified to the Koç Holding Corporate Brand Communications and Sponsorship Department by Arçelik Global Communications Department;
- For Sponsorships, the parties shall enter into a written agreement detailing all the conditions;
- For Sponsorships, sponsored entity, must provide the Global Communications Department post-event documentation (i.e. photos, videos or a report etc. as may be relevant) or any other documents or materials evidencing compliance with the Sponsorship agreement as soon as practically possible after the completion of the sponsored event or project. If, however, the sponsored event is a recurrent event, the Sponsorship agreement shall set forth the content and the frequency of reporting.);
- Supporting documents such as receipts and invoices must be kept by the accounting department and transactions must be booked in accordance with the relevant legislation;
- Due Diligence, approval, execution and follow-up processes shall be documented to be used for audit and compliance review where necessary;
- A report listing Donation and Sponsorship activities (including purpose, entity and due diligence results) shall be sent to Legal and Compliance Department in Koç Holding, on an annual basis, by the Global Communications Department of Arçelik.
- Arçelik and its Group Companies should follow the following approval stages according to the Donation amounts.

DONATION AMOUNT	APPROVAL PROCESS
<p style="text-align: center;">Equivalent amounts below USD 5,000</p>	<p>Turkey: Approvals of the Director of the relevant business unit making the request and the CFO</p> <p>Foreign Subsidiary: Joint approvals of the Country Manager and the top manager of the finance and accounting unit of the relevant foreign subsidiary.</p>
<p style="text-align: center;">Exceeding the equivalent of USD 5,000 and more</p>	<p>Turkey: Approvals of the Director of the relevant business unit making the request, Legal and Compliance Director, CFO and the relevant Assistant General Manager.</p> <p>Foreign Subsidiary: Approvals of the Country Manager of the relevant subsidiary, the Regional Director (if any), the Management Team Member responsible for the relevant subsidiary and the CFO.</p>

- Donations with a yearly total value of 1,000,000 TL or above or its equivalent in any other currency require a resolution of the Board of Directors. The tracking of reaching this amount is done by Arçelik Accounting Department.
- The CFO and the Management Team Member responsible for the relevant subsidiary must be informed when the annual Donation amount of foreign subsidiary exceeds USD 25,000 or equivalent. This notification is made by top managers of the finance and accounting unit of foreign subsidiaries and, in Turkey, this notification is made by Accounting Director.
- All Donations are reported to the Global Compliance Management under the Legal and Compliance Department. The top manager of the finance and accounting unit of each subsidiary informs the Global Compliance Management about the Donations of foreign subsidiaries.
- Legal and Compliance Department informs Arçelik Global Communications Department regarding the approved Donations.

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of Arçelik and its Group Companies are responsible for complying with this Policy. Arçelik and its Group Companies also expect and take necessary steps to ensure that all its Business Partners to the extent applicable complies with and/or acts in line with this Policy. Board of Directors and the country manager where the Donations and Sponsorship process take place remain liable from the risks created due to those processes.

This Policy has been prepared in accordance with the Koç Group Donation and Sponsorship Policy. If there is a discrepancy between the local regulations, applicable in the countries where Arçelik and its Group Companies operate, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Arçelik Global Code of Conduct, you should report this incident via the below mentioned reporting channels:

Web: www.ethicsline.net

Hotline Phone Numbers as listed in the web site:

<https://www.arcelikglobal.com/en/company/about-us/global-code-of-conduct/>

Legal and Compliance Department, is responsible for arranging, periodically reviewing and revising the Global Donation and Sponsorship Policy when necessary. Arçelik's and its Group Companies' employees may consult to the Arçelik Legal and Compliance Department regarding their questions about this Policy and its implementation. Violation of this Policy by an employee may result in significant disciplinary actions, including dismissal. If any third party that is expected to comply with this Policy acts in violation of this Policy, the relevant contracts may be terminated.

Last Updated: 17.10.2022