

DONATION AND SPONSORSHIP POLICY

Doküman No / Document No	500020-EN
Revizyon No / Revision Number	00
Yürürlük Tarihi / Effective Date	01.10.2024

Hazırlayan / Prepared by	Kontrol Eden / Controlled by	Onaylayan / Approved by
Hukuk ve Uyum Lideri Legal and Compliance Leader TUĞÇE ULUDAĞ	Kalite Sistem Lideri Quality System Leader AYSEL YILDIRIM	Yönetim Kurulu Board of Directors

1. PURPOSE AND SCOPE

The purpose of this Donation and Sponsorship Policy (the “Policy”) is to set out the standards, principles, and rules to be followed when making donations and providing sponsorships. In line with our strong belief that contributing to the community is the essential foundation for building a successful business. KoçMedikal views donations and sponsorships as a way to support the communities in the countries in which it operates.

All employees, directors and officers of KoçMedikal shall comply with this Policy¹, which is an integral part of KoçMedikal Code of Ethics. KoçMedikal expects and takes necessary steps to ensure that all its Business Partners -where applicable- comply with and/or act in accordance with this Policy.

2. DEFINITIONS

“**Business Partner**” includes suppliers, distributors, dealers, authorized services and other third parties with whom KoçMedikal has a business relationship and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of KoçMedikal, as well as their employees, representatives, execution assistants or deputies.

“**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.

“**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 consolidated financial report.

“**KoçMedikal**” means Koç Medical B.V., Bıçakçılar Tıbbi Cihazlar Sanayi ve Ticaret A.Ş. and all companies that Bıçakçılar Tıbbi Cihazlar Sanayi ve Ticaret A.Ş. directly or indirectly, individually or jointly are under its control.

“**KoçMedikal Board of Directors**” refers to the members of the board of directors of Bıçakçılar Tıbbi Cihazlar Sanayi ve Ticaret A.Ş.

“**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.

¹ For other relevant policies, please refer to the KoçMedikal Community Investment Policy, the KoçMedikal Anti-Bribery and Anti-Corruption Policy, and the KoçMedikal Gifts and Entertainment Policy.

3. GENERAL PRINCIPLES

When making Donations and providing Sponsorships, KoçMedikal shall ensure that:

- it complies with governing documents (including but not limited to its Articles of Association), and the restrictions and limits set forth by its General Assembly and/or the Board of Directors or similar body.
- it complies with all applicable laws in the jurisdictions in which it operates, including but not limited to relevant capital markets regulations, commercial and tax laws where applicable.
- it does not conflict with the values or business interests of KoçMedikal and complies with the principles in this Policy, Koç Group and KoçMedikal Code of Ethics.
- it must be properly documented in accordance with the relevant legislation.

The Donation and/or the Sponsorship:

- is properly documented and never used in exchange for obtaining an improper advantage or benefit or used for the purpose of any form of corruption;
- is not offered in connection with any bid, contract renewal or business opportunity;
- is not made for political purposes to any politician, political party or political group, municipality or government official, either directly or indirectly through third parties²;
- is not for the benefit of any entity or organization that discriminates on the basis of ethnicity, nationality, gender, religion, race, sexual orientation, age or disability or
- will not be used directly or indirectly to violate human or animal rights, to promote tobacco, alcohol and illegal drugs, or to damage the environment.

4. APPLICATION OF THE POLICY

Prior to entering into any agreement or commitment on behalf of KoçMedikal, with any new third party for a Donation or a Sponsorship, notwithstanding the Signature Circular and/or Articles of Association of KoçMedikal:

- If initiated by a department other than the department responsible for brand communication and sponsorships, a written proposal describing the intended use of the funds and information regarding the relevant entity (name, address, senior management) shall be submitted to the KoçMedikal People and Culture Department for evaluation of the impact on the corporate image and brand. If the result of the assessment is positive, then:
- The People and Culture Department shall forward the proposal to the Legal and Compliance Department for Due Diligence³;
- If the outcome of the Due Diligence is positive, the relevant Donation or Sponsorship shall be submitted for final approval to the management or the Board of Directors in accordance with the Signature Circular of KoçMedikal;
- Upon completion of the processes described above, any Donation or Sponsorship that may have a significant impact on “Koç” brand and corporate image, shall also be notified by KoçMedikal to Koç Holding Corporate Brand Communications and Sponsorship Department prior to approval or execution by the Board of Directors;
- For Sponsorships, the parties shall enter into a written agreement detailing all terms and conditions;
- For Sponsorships, the sponsored entity shall provide the People and Culture Department with post-event documentation (i.e. photos, videos or a report etc. if relevant) or any other documents or materials that demonstrate compliance with the sponsorship agreement as soon as practicable after the completion of the

² Please refer to KoçMedikal Ethics Code and the Anti-Bribery and Anti-Corruption Policy.

³ Due Diligence will be conducted in accordance with KoçMedikal Sanctions and Export Control Policy and KoçMedikal Anti-Bribery and Anti-Corruption Policy. To the extent necessary, relevant documents will be shared with other departments (including legal, tax and capital markets compliance review).

sponsored event or project. However, if the sponsored event is a recurring event, the sponsorship agreement shall specify the content and the frequency of the reporting.)

- Supporting documentation, such as receipts and invoices, shall be retained by the Accounting Department and transactions shall be recorded in accordance with applicable laws;
- All Donations and Sponsorships shall be reported to the Legal and Compliance Department;
- Due diligence, approval, execution and follow-up processes shall be documented to be used for audit and compliance review as required; and
- A report detailing the Donation and Sponsorship activities (including purpose, entity and due diligence results) shall be sent to the Koç Holding Legal and Compliance Department, on an annual basis.

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of KoçMedikal are responsible for complying with this Policy, implementing, and supporting KoçMedikal's procedures and controls in accordance with the requirements of this Policy. KoçMedikal also expects and takes necessary steps to ensure that all its Business Partners, to the extent applicable, comply with and/or act in accordance with this Policy.

If there is a discrepancy between the local regulations, applicable in the countries where KoçMedikal operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local laws and regulations, the stricter of the two, supersede.

If you become aware of any action that you believe is inconsistent with this Policy, Code of Ethics, you may seek guidance or report the incident to your line managers or Legal and Compliance Department. Alternatively, notifications to the Ethics Hotline can be made via the following link: "koc.com.tr/hotline".

KoçMedikal employees may contact the KoçMedikal Legal and Compliance Department for their questions regarding this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

6. EFFECTIVE DATE

This Policy takes effect on 01.10.2024 upon approval of the Board of Directors of KoçMedikal and Legal and Compliance Department is responsible for updating the Policy.