

COMMUNITY INVESTMENT POLICY

Doküman No / Document No	500090-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 Community Investment Policy (“**the Policy**”) is to set out the principles to be adopted in developing community investment initiatives. KoçMedikal recognizes the impact of its activities on its stakeholders, the environment, and community at large and emphasizes the importance of sustainable development.

This Policy, which is an integral part of the KoçMedikal Code of Ethics and Koç Group Code of Ethics¹, is developed to demonstrate KoçMedikal’s commitment to making a positive impact on the welfare and sustainable development of the communities and the environment with which it engages as a corporate citizen.

KoçMedikal is committed to conducting its business in accordance with the highest ethical standards. As a signatory of the UN Global Compact, Koç Holding A.Ş. adheres to the 10 Principles of the UN Global Compact. KoçMedikal, as a Koç Group subsidiary, ensures to act in accordance with these principles.

This Policy reflects Koç Holding’s approach to sustainability: “Lead. Together.” and Koç Group Sustainability Guide², which is adopted by KoçMedikal.

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 company 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 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.

“**The Sustainable Development Goals**”³ are the 17 Goals adopted by all UN Member States in 2015, 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 justice.

¹ Please refer to Koç Group Code of Ethics

² <https://www.koc.com.tr/sustainability>

³ <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

“The UN” means the United Nations.

“The UN Global Compact”⁴ is a global pact initiated by the United Nations, to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labour, the environment and anti-corruption.

3. GENERAL PRINCIPLES

KoçMedikal conducts “Due Diligence”⁵ on organizations or individuals that are supported by KoçMedikal, in order to ensure that Community Investments are made by the reliable parties with sound purposes.

KoçMedikal ensures that Community Investments comply with Koç Group Code of Ethics, Human Rights Policy, Donations and Sponsorship Policy, Anti-Bribery and Corruption Policy and other relevant KoçMedikal policies.

When applying to memberships in regional, national, or international organizations, or signing to agreements related to Community Investments, it is necessary to ensure compliance with the principles of the UN Global Compact as it may affect Koç Group’s or KoçMedikal’s reputation.

4. APPLICATION OF THE POLICY

KoçMedikal considers the following when making Community Investments:

- Whether the relevant Community Investment is compatible with the priorities and needs of the regions where business activities are carried out,
- Establish a clear link between Community Investment activities and business strategy,
- Establish strong partnerships with civil society organizations, international organizations, universities or individuals to propose applicable solutions,
- Ensure that the objectives and results of the Community Investments are measurable and scalable by design, and that the results have the potential to be disseminated to across other companies and regions, and
- Ensure that they are aligned with the social and environmental objectives outlined in the UN Sustainable Development Goals.

5. AUTHORITY AND RESPONSIBILITIES

This Policy is intended to provide guidance to all employees and officers of KoçMedikal in developing community investment initiatives. If you notice any action or transaction that you believe is inconsistent with this Policy, you may consult KoçMedikal Legal and Compliance Department.

KoçMedikal employees may consult KoçMedikal People and Culture Department for their questions about this Policy and its implementation. Violation of this Policy by an employee may result in significant disciplinary action, including dismissal. In the event that any third party expected to act in compliance with this Policy acts in violation of this Policy, the relevant contracts may be terminated.

6. EFFECTIVE DATE

This Policy has entered into force with the decision of KoçMedikal Board of Directors dated 01.10.2024 and Legal and Compliance Department is responsible for updating the Policy.

⁴ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

⁵ Please refer to KoçMedikal Sanctions and Export Controls Policy.