GLOBAL DONATION AND AID POLICY

aksa

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1. PURPOSE AND SCOPE

This policy determines the principles regarding “Donations and Sponsorships” adopted and implemented by the Company in its activities, relations with national and international public institutions and the private sector.

This policy is an integral part of the Global Corporate Compliance Program of Kazancı Holding, the major shareholder of the Company, together with national and international legal regulations aimed at providing an honest, transparent and ethical business environment, and is compatible with the Company’s other policies.

The policy aims to protect and develop the Company’s reputation and trust, meet the expectations of internal and external stakeholders, and demonstrate the Company’s determination to manage compliance risks effectively and efficiently.

This policy covers all managers and employees in the countries where the Company operates. All Business Partners are obliged to meet the ethical standards expected from the Company’s business partners in the services and actions performed on behalf of the Company.

2. DEFINITIONS

Donation: Cash and in-kind aid provided by the Company to institutions and organizations for the purpose of contributing to the realization of a public benefit or social goal without expecting anything in return.

Sponsorship: Cash and in-kind support of social and cultural activities by the Company for the purpose of obtaining a corporate benefit.

Business Partners: The party with which the Company has any type of business relationship or plans to establish a business relationship. Business partners have a wide definition including but not limited to joint ventures, contractors, subcontractors, consultants, suppliers, intermediaries, distributors, representatives, investors.

3. BASIC PRINCIPLES

The Company defines supporting the development of social standards in the countries where it operates as one of its basic goals.

In line with this goal, the Company researches and supports donation programs in the following areas:

- Society,
- Education,
- Environment,
- Health,
- Culture and Arts,
- Sports

4. SCOPE OF DONATION AND SPONSORSHIP ACTIVITIES

The Company aims to take part in sponsorship activities that are in line with its brand, advertising and marketing strategies.

All donation and sponsorship activities must be in line with,

- National and international regulations in force,
- Company Policies.

It is prohibited to engage in donation and sponsorship activities that fall within the scope of the following:

- Activities that may violate current regulations,
- Activities that may cause a conflict of interest,
- Activities that may harm the Company's reputation.

5. LIMIT OF DONATIONS TO BE MADE

According to the Capital Markets Board's Communiqué on Dividends No. II-19.1, the upper limit of the donation to be made is determined by the General Assembly each year in cases not specified in the articles of association.

6. POLICY-RELATED QUESTIONS AND CONSULTANCY

For questions and consultancy requests in order to ensure that business plans are carried out in accordance with the policy, the Compliance Department can be contacted at **uyum@aksa.com.tr**.

7. ENFORCEMENT

In accordance with the Capital Markets Board's Communiqué on Corporate Governance numbered II-17.1, the policy created regarding donation processes is submitted to the General Assembly for approval. In line with the approved policy, the amount and beneficiaries of all donations and aid made during the period and the necessary announcements are made to the public by informing the shareholders with a separate agenda item at the Annual General meeting. This revised policy entered into force with the decision of the Aksa Energy Board of Directors dated 9 May 2025.

Our Corporate Governance Policies are one of the cornerstones of our strategy and an integral part of our business culture.