



<b>Document Name</b>	Donation and Sponsorship Policy		
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TABLE OF CONTENTS

<b>1.</b>	<b>PURPOSE AND SCOPE .....</b>	<b>2</b>
<b>2.</b>	<b>DEFINITIONS .....</b>	<b>2</b>
<b>3.</b>	<b>GENERAL PRINCIPLES .....</b>	<b>3</b>
<b>4.</b>	<b>REQUESTS and APPROVALS .....</b>	<b>4</b>
<b>4.1.</b>	<b>DONATION REQUESTS and APPROVALS .....</b>	<b>4</b>
<b>4.2.</b>	<b>SPONSORSHIP REQUESTS AND APPROVALS.....</b>	<b>4</b>
<b>5.</b>	<b>CONDUCT OF DONATION AND SPONSORSHIP PROCEDURES .....</b>	<b>5</b>
<b>5.1.</b>	<b>CONDUCT OF DONATION PROCEDURES .....</b>	<b>5</b>
<b>5.2.</b>	<b>CONDUCT OF SPONSORSHIP PROCEDURES .....</b>	<b>6</b>
<b>6.</b>	<b>AUTHORITY AND RESPONSIBILITIES.....</b>	<b>6</b>
<b>7.</b>	<b>RECORDS .....</b>	<b>7</b>
<b>8.</b>	<b>ENTRY INTO FORCE .....</b>	<b>7</b>

## 1. PURPOSE AND SCOPE

The purpose Donation and Sponsorship Policy ("the Policy") is to set the basic rules for Polat Group Holding A.Ş. and its Group Companies ("Polat Group", "the Group") regarding Donation and Sponsorship activities in addition to the definitions given in the "Codes of Business Conduct Policy".

By this Policy, Polat Group aims at ensuring protection against any potential conflicts of interest that may emerge as a result of its Donation and Sponsorship activities conducted for the benefit of and for contributing to the community and avoidance of any transactions that may lead to suspected bribery / corruption.

## 2. DEFINITIONS

**Donation:** shall mean cash or in kind (such as the provision of products or services) aids charitably offered to individuals and institutions (such as associations, unions, and other nonprofit organizations), universities, schools, and other public or private agencies and institutions for general interest in order to contribute to the achievement of a social/environmental objective with social responsibility consciousness.

**Request and Approval Form for Donation / Sponsorship** shall mean a document that is filled out a Polat Group's unit manager, who makes a Donation or Sponsorship request, and that is submitted to the Corporate Communication Department for seeking the approval of the General Manager in charge.

**Employee:** shall mean all persons working within Polat Group Holding including white- and blue-collar employees, senior executives, consultants, service providers, interns, and 3rd persons working for the company.

**Conflict of Interest:** shall mean any kind of interests and personal benefits that the employees may have and that impact their ability to impartially fulfill their duties and significantly impair their objectivity and that are quantifiable or nonquantifiable in monetary terms.

**Due Diligence:** shall mean the identification of the organization's third parties and confirmation of such identifications from reliable sources, determination of the financial transactions' final beneficiaries, acquisition of shareholding details and identification of owners in the case of legal entities, acquisition of information on any type of transactions to be established and on the nature thereof, and periodic implementation of these matters also after the establishment of a business relation.

**Business Conduct and Compliance Committee:** shall mean the committee that is in charge of supervising the matters of misuse and business conduct at Polat Group.

**Right Holder:** shall mean a private person, legal person, agency or institution that receives a donation or sponsorship as being responsible for the management and adequate use thereof.

**Humanitarian Aid:** shall mean a support or aid provided to meet potential social needs in the aftermath of emergencies or natural disaster.

**Public Organization:** shall mean all state-owned or state-controlled institutions and organizations that are established in Türkiye or abroad to fulfill a public duty or certain public services.

**Polat Group:** shall mean the Polat Group Companies (Polat Makine, PGR, PG Kimya, İMS, and Polat Group Holding) and all personnel employed by these companies.

**Bribery:** shall mean the solicitation or offering of or mediation for any physical or intangible benefit for a Public Official (or in the name of a Public Official) or any third person with an aim to ensure the fulfillment, slowdown, expediting, or nonfulfillment of an undertaking in the name of a natural or legal person and ensuring any direct or indirect benefit as a result.

**Publicly exposed person:** shall mean a domestic or foreign high level individual that is entrusted with a prominent public function through election or assignment and other individuals that act as the members of the board of directors, senior executives, and equal officers of international organizations.



**Sponsorship:** shall mean the offering of cash or in kind (product/service) support for social, artistic, sports, educational, cultural, humanitarian aid, etc. activities and events in line with corporate objective under a sponsorship contract or under any other type of contracts, though designated differently, but containing sponsorship conditions.

**Corruption:** shall mean the solicitation, offering, grant, and acceptance of any kind of unlawful benefits concerning an authorized person by virtue of their function and the misconduct in office to earn benefits.

**The Compliance Officer:** Shall mean the persons that are in charge of setting the framework of compliance operations, management of a compliance program, and taking and supervision of preventive actions as per policies and procedures throughout Polat Group. The Compliance Officer shall be the Legal and Compliance Counsel.

### 3. GENERAL PRINCIPLES

The following activities of Polat Group companies in line with their decisiveness to support local development and quality of life in their areas of operation shall satisfy the below conditions:

- Any donations must be of such a nature that it will have a positive social impact, must conform to the company's corporate strategy, and must have a social, cultural, educational, humanitarian aid, etc. goal;
- Every sponsorship must conform to the corporate brands' marketing strategies and the employer's brand;
- Ever donation and sponsorship must conform to the limits set by the Company's Articles of Association, General Assembly, Board of Directors, and/or similar authorized bodies, legislation in force, and Polat Group's Principles and Policies.

Donation and Sponsorship may not be conducted as follows:

- a. That violate / may violate the legislation in force;
- b. That create / may create a conflict of interest seemingly or potentially;
- c. That will be extended to a right holder that is a related party vis-a-vis Polat Group through its legal representatives or managers;
- d. That give / may give harm to Polat Group companies' reputation;
- e. That is intended to be used for any type of bribery or corruption;
- f. That relates to any commercial opportunity such as the award of any contract, entering into a new business contract or renewal of an existing business contract, etc.;
- g. That has the purpose of offering any benefit for political purposes to any politician, political party, municipality, government officer, or any publicly exposed person directly or indirectly through a third person;
- h. That is in favor of any agency or institution which discriminates people on the basis of ethnic origin, nationality, gender, religion, race, sexual orientation, age, or disability; and
- i. That is directly or indirectly intended to violate human or animal rights, promote of illicit drugs, or damage the environment.

In addition to these conditions:

- The upper limit of donation and sponsorships to be offered by Polat Group companies shall be set by the Board of Directors of Polat Group Holding and donation and sponsorships offered during a year shall be reported to the Holding's Board of Directors.
- The grant of any Donation or Sponsorship shall not automatically be constructed that the right holders of other third parties are entitled to use Polat Group companies' logo and other visual identities. The specific approval of the relevant Company's General Manager must be obtained in order to use any logos of Polat Group companies and any visual identities representing the company, its brands and plants.

#### **4. REQUESTS and APPROVALS**

The following request and approval processes shall be followed for any Donation and Sponsorship activities to be fulfilled at Polat Group and the donations and sponsorships must be included in the relevant period's budget and must not exceed the budgetary limits.

##### **4.1. DONATION REQUESTS and APPROVALS**

- The department that offers the relevant Donation shall submit its request in writing accompanied by the official information and documentation of the third parties that will receive the donation and details of the resources to be used to Polat Group's Human Resources and the Corporate Development Office of Corporate Development Department for a corporate image and brand impact assessment. The right holder and the requesting department must confirm the information provided.
- Where required, the Corporate Development Office obtains additional information and documentation from the third parties that will receive the Donation and conducts a pre-assessment regarding the conformity of the relevant Donation's with Polat Group's Codes of Conduct and related policies.
- If the Donation request's pre-assessment gives a positive result, the Corporate Development Office shall share the request and all information and documentation of the Right Holder with the Legal and Compliance Department for "Due Diligence."
- Where the result of Legal and Compliance Department's review is positive, the request shall be referred to the Financial Affairs Director for financial assessment approval.
- Following the Financial Affairs Director's approval, the request shall be submitted to the relevant General Manager and Board of Directors for the final approval as per the internal directives of Polat Group Holding A.Ş.
- Following the final approval, the payment request shall be submitted to the Finance unit and the relevant payments shall be made in line with the principles of Donation and Sponsorship Policy.
- Transfer of any monies or any monetizable assets or provision of goods/services to a Right Holder, who is not approved by Polat Group Holding's Board of Directors, or to any individual or institution that is not the official representative of the Right Holder is prohibited.

##### **4.2. SPONSORSHIP REQUESTS AND APPROVALS**

- The department that offers the relevant Sponsorship shall submit its request in writing accompanied by the official information and documentation of the third parties that asks for sponsorship and details of the resources to be used to the Corporate Development Office for a

corporate image and brand impact assessment. The right holder and the requesting department must confirm the information provided.

- Where required, the Corporate Development Office obtains additional information and documentation from the third parties that ask for sponsorship and conducts a pre-assessment regarding the conformity of the request with Polat Group's Codes of Conduct and related policies.
- If the request's pre-assessment gives a positive result, the Corporate Development Office shall share the request and all information and documentation of the Right Holder with the Legal and Compliance Department for "Due Diligence."
- Where the result of Legal and Compliance Department's review is positive, the request shall be referred to the Financial Affairs Director for financial assessment approval.
- Following the Financial Affairs Director's approval, the request shall be submitted to the relevant General Manager and Board of Directors for the final approval as per the authorized signatory list of Polat Group Holding A.Ş.
- Following the final approval, the Legal and Compliance Department shall draft a Sponsorship Contract in line with the rules enumerated in the "Donation and Sponsorship Policy" and this contract shall be mutually signed with the Right Holder.
- The contract to be signed with a Right Holder must set forth that the Right Holder shall abide by Polat Group's Codes of Conduct and related company policies throughout the contract's validity and any breach thereof shall constitute a cause of termination.
- Transfer of any monies or any monetizable assets or provision of goods/services to a Right Holder, who is not approved by Polat Group Holding's Board of Directors, or to any individual or institution that is not their official representative is prohibited. This conditions must be included in the Sponsorship contract to be signed with a Right Holder.

## **5. CONDUCT OF DONATION AND SPONSORSHIP PROCEDURES**

The following principles shall be applicable to the payments, product deliveries, service offerings, documentation, accounting, etc. stages within the scope of implementation following the completion of Donation and Sponsorship request and approval processes:

### **5.1. CONDUCT OF DONATION PROCEDURES**

- The monetary Donations shall be transferred only to the bank account of a Right Holder or of an individual or entity that officially represents them. The product and service Donations shall, again, be made only to a Right Holder or to an individual or entity that officially represents them.
- Any change to the relevant Donation's scope (for example, its type, right holder, donation's content, amount, quantity, method of payment, etc.) shall give rise to the renewal of the approval process.
- Following the actual fulfillment of a Donation procedure, the Corporate Development Office shall, within the shortest possible time, archive any and all supporting information and documentation (receipt, invoice, dispatch note, report, photograph, video, etc.) evidencing that the donation has been made for its intended purpose. Where the Donation in question is an

ongoing project, then this information and documentation must be archived periodically in their up-to-date form.

- Financial transactions relating to all Donations granted shall be recorded by the Financial Affairs Department as per the relevant legislation.
- All documentation regarding request, review, assessment, approval, implementation, recording, and follow-up processes shall be kept by the Corporate Development Office for reference during Compliance audits.

## **5.2. CONDUCT OF SPONSORSHIP PROCEDURES**

- The monetary Sponsorship amounts shall be transferred only to the bank account of a Right Holder, who is named in the Sponsorship contract, or of an individual or entity that officially represents them. The product and service Sponsorships shall, again, be delivered / offered only to a Right Holder or to an individual or entity that officially represents them as set forth in a Sponsorships contract to be made regarding the sponsorship-subject products and services.
- Any change to the relevant Sponsorship's scope (for example, its type, right holder, donation's content, amount, quantity, method of payment, etc.) shall give rise to the renewal of the approval process.
- Following the actual fulfillment of a Sponsorship procedure, the Corporate Development Office shall, within the shortest possible time, archive any and all supporting information and documentation (receipt, invoice, dispatch note, report, photograph, video, etc.) evidencing that the relevant Sponsorship has been conducted in line with the contractual conditions. Where the Sponsorship in question is an ongoing project, then this information and documentation must be archived periodically in their up-to-date form.
- Financial transactions relating to all Sponsorships fulfilled shall be recorded by the Financial Affairs Department as per the relevant legislation.
- All documentation regarding request, review, assessment, approval, implementation, recording, and follow-up processes shall be kept by the Corporate Development Office for reference during Compliance audits where required.

## **6. AUTHORITY AND RESPONSIBILITIES**

All employees and managers of Polat Group companies must abide by this Policy. Polat Group's employees shall be liable to be aware of the laws and customs of any jurisdictions where Polat Group operates.

In case the local legislation that is applicable in the jurisdictions where Polat Group operates differs from this Policy, the more conservative (stricter) of them shall be deemed valid and implemented.

Details of Donation and Sponsorship-related activities shall be reported by the Human Resources and Corporate Development Director once a year as a minimum to the Business Conduct and Compliance Committee together with the outcomes regarding purpose, beneficiary, and Due Diligence.

Please contact the Compliance Officer should you have questions regarding this Policy.

The Compliance Officer may establish any additional measures and rules that will not be in conflict with this Policy and that will be implemented in their own department by seeking the Business Conduct and Compliance Committee's approval.

Employees are urged to contact the Polat Group's Business Conduct Reporting Line for any actual or suspected breach of this Policy or governing legislation:

Email: [polatgrupetik@kpmg.com](mailto:polatgrupetik@kpmg.com)

Telephone: 0 850 281 7343

Website: [www.polatgrupetik.com](http://www.polatgrupetik.com)

Polat Group's employees and managers shall be liable to abide by this Policy and they are aware that they will undergo investigations and sanctions in case of a breach.

The breach of this Policy by a manager or an employee may lead to serious disciplinary measures that involve dismissal.

## **7. RECORDS**

This Policy shall be shared with employees in such locations (in printed and/or electronic media) that are easily accessible by all employees at any time. The Legal and Compliance Department shall keep the original copy hereof.

## **8. ENTRY INTO FORCE**

This Policy enters into force under the Board of Directors Resolution dated 28.12.2023. The Legal and Compliance Department shall be responsible for considering any potential revision needs of this Policy and for updating it.