

TÜRK TELEKOMÜNİKASYON A.Ş.

SUSTAINABILITY POLICY

1. PURPOSE

This policy has been prepared in order to define the sustainability approach of Türk Telekomünikasyon A.Ş. (Türk Telekom) and to establish a strong sustainability culture that covers all stakeholders by creating the basis of the sustainability management system.

2. SCOPE

This Policy covers the Board of Directors and all managers and employees working at every level at Türk Telekomünikasyon A.Ş. Türk Telekom also expects its suppliers and business partners to comply with this Policy and encourages their employees to do so.

3. DEFINITIONS AND ABBREVIATIONS

ESG: Environmental, Social and Governance

CDP: Carbon Disclosure Project

GRI: Global Reporting Initiative. An independent international organisation that provides guidance on sustainability reporting.

Corporate Sustainability: It means taking economic, environmental and social factors into account in company activities and decision mechanisms together with corporate governance principles and effectively managing the risks associated with these factors in order to create long-term value.

UDHR: Universal Declaration of Human Rights

UNGC: United Nations Global Compact: UNGC is a corporate sustainability initiative. United Nations (UN) General Assembly resolution No. 79/224 defines the activities of the UN Global Compact as promoting responsible business practices and UN values in the business world and in the UN system under the mandate of the UN General Assembly.

SDG: Sustainable Development Goals

Sustainability Reporting: As encouraged by the GRI Standards, it is the Company's public reporting on its economic, environmental and/or social impacts and thus its positive contributions or negative effects to the sustainable development goal.

4. SUSTAINABILITY VISION

Working for the future of Türkiye with the strength it derives from its deep-rooted history of more than 180 years, Türk Telekom, the first integrated telecommunication operator of Türkiye, aims to integrate the universal principles of sustainability into its business model, strategies and corporate decisions in order to leave a liveable world to future generations. It aims to manage sustainability in its entire value chain and activities by following a sustainable business model that contributes to the Sustainable Development Goals (SDGs). For a long-term, strong and successful business model it focuses on operating sustainably.

Türk Telekom undertakes investments in a holistic approach with the awareness and responsibility of leading Türkiye's access to technology and digital transformation. Taking it as a duty to deliver communication technologies to all its subscribers, from individuals living in the most remote corners of Türkiye to largest companies, Türk Telekom is aware of the positive contribution it will make to the Sustainable Development Goals (SDGs).

Türk Telekom considers generating sustainable value for all stakeholders in the long term as well as achieving a strong financial performance as one of the key elements of its strategy. By supporting the effective management of risks and opportunities around sustainability issues through sustainable development goals, Türk Telekom establishes the Sustainability Management System that covers environmental, social and governance issues and the appropriate organisational structure required for it.

The Company follows the national and international agenda, global trends and best practices in sustainability and believes that sustainability studies can only be successful if they are adopted by all stakeholders; therefore, aims to create awareness around sustainability to make it part of the corporate culture.

Türk Telekom adopts a sustainability approach that aims to achieve its long-term goals that it has set within the framework of its holistic sustainable development approach together with its shareholders, customers, employees and other stakeholders in line with the principles of accountability and transparency.

5. FOCUS AREAS AND PRINCIPLES

The Policy hereby presents a general approach to Türk Telekom's Environmental, Social and Governance (ESG) focus areas and principles. Conducting its activities in accordance with the principle of "Accessible Communication for all", Türk Telekom commits to act pursuant to the 10 basic universal principles of the United Nations Global Compact (UNGC), and takes the Sustainable Development Goals as its guide in its business conduct. Türk Telekom defines its focus areas in designing a sustainable future as follows:

5.1 Trust Focus – Doing Business Responsibly

Trust is a fundamental element of a digitalising world. Believing in the importance of winning the trust of all stakeholders, Türk Telekom commits conducting its activities in an honest, reliable, legal and ethical manner.

- 5.1.1 Türk Telekom Group Companies comply with the legal regulations on bribery and corruption in all countries they operate and are represented at. They adopt a "zero tolerance" approach against bribery and corruption. They commit conducting activities in an honest, reliable, legal and ethical manner.
- 5.1.2 Transparency, honesty and sincerity constitute the main values in procurement processes. Guides its suppliers to act in accordance with Türk Telekom's Sustainability Policy.
- 5.1.3 Participates in sustainability-focused initiatives and indices and undertakes sustainability reporting through a sustainability approach that is based on sharing its long-term targets with shareholders, customers, employees and other stakeholders.
- 5.1.4 Implements the Corporate Governance Principles diligently and oversees the interests of all shareholders and stakeholders equally in a transparent and close relationship.

5.2 Climate Change and EnvironmentFocus

Türk Telekom is aware of the risks posed by the global climate crisis and works to mitigate these risks. It creates systems to ensure responsible use of natural resources and their continuity. It considers fulfilling its environmental responsibilities as a duty.

Türk Telekom;

- 5.2.1 complies with all environment related national and international regulations and other obligations that it is subject to.
- 5.2.2 measures the significant environmental impacts arising from its activities and aims to continuously improve its environmental performance.
- 5.2.3 participates in the Zero Waste Project in order to prevent the rapid depletion of natural resources. It cooperates with competent and qualified companies in recycling the materials and resources that remain idle as a result of technological transformation.
- 5.2.4 with high awareness around the impact of excessive energy consumption on society and the environment, focuses on investments and studies in energy efficiency and renewable energy.
- 5.2.5 monitors carbon emissions from its activities and participates in the Carbon Transparency Project (CDP). It offers products and services that support low-carbon economy. It contributes to reduction of greenhouse gas emissions by supporting different sectors through these services and products.
- 5.2.6 conducts electromagnetic field measurements before and after the installation of base stations and ensures that they work safely for people and the environment.
- 5.2.7 contributes to high efficiency in smart living in areas including transportation, security, energy, health, environment and life through its products and services it has developed for next generation cities.

5.3 Focus on Valuing People

Considering its employees as its primary asset, Türk Telekom aims to apply its people-centric principle "Makes You Feel Valuable" to all Human Resources policies, systems and processes.

- 5.3.1 respects the fundamental human rights in the United Nations Universal Declaration of Human Rights, the material and moral existence of human beings, and conducts all its activities accordingly.
- 5.3.2 Türk Telekom prohibits all practices of forced labour, including drudgery, child labour, employing illegal immigrants and foreign personnel without a work permit, debt slavery and all forms of human trafficking.
- 5.3.3 Türk Telekom values diversity, considers it an important asset, and commits to equal opportunities.
- 5.3.4 Türk Telekom contributes to improving the knowledge and skills of its employees, their adaptation to recent technologies, their performance and competence through the training opportunities it offers.
- 5.3.5 Türk Telekom is aware of the necessity of collaborating with its employees in order for its sustainability strategy to be successful. It cares for improving employee experience.
- 5.3.6 Türk Telekom complies with all national and international regulations that it is subject to in occupational health and safety. With a proactive approach in creating a healthy and safe working environment, it conducts studies to identify risks, to prevent and reduce occupational accidents and occupational diseases that may occur due to existing risks.
- 5.3.7 Türk Telekom supports its employees' legal rights to assemble, unionise and form associations.

5.4 Customer Focus

Türk Telekom takes a customer-oriented approach in its operations and cares for enriching the customer experience. It aims to provide continuous and secure communication services through its resilient and robust infrastructure across Türkiye.

5.4.1 It supports its customers in gaining an advantage in local and international competition, while improving the customer experience by increasing productivity through its innovative digital products and services. It establishes collaborations and business partnerships when necessary in this regard. Thus, it generates direct and indirect value for the country's economy.

5.4.2 carrying the responsibility of a telecommunication company that constructs and develops Türkiye's communication infrastructure, it aims to provide access services to all corners of the country as well as ensuring the resilience of its infrastructure and the continuity of communication.

5.4.3 As Türkiye's cyber security operator, it works for national security by protecting the country's data. It follows legal requirements for the protection of employee, customer and other personal data sourced from its field of activity, and fulfils all its obligations in this regard.

5.5 Focus on Contributing to Society

Türk Telekom offers information technologies, a key enabler of sustainable economic growth and social development, for use in every corner of Türkiye.

5.5.1 In addition to the products and services it develops, Türk Telekom considers making information available for all segments of the society that cannot participate in social life equally due to economic, social or physical reasons amongst its corporate responsibilities, and carries out its activities based on the principle of "Accessible communication for all". Moreover, Türk Telekom supports United Nations Sustainable Development Goals through its business conduct and corporate social responsibility projects. Aiming to eliminate the digital gaps in

society, it contributes to the availability of information for all segments of the society.

- 5.5.2 It sets an example by undertaking projects that provide solutions to the primary needs of the society, and aims to increase public awareness at this front.
- 5.5.3 In its social responsibility activities, Türk Telekom implements an 'inclusive business model' that is indispensable for sustainable global development. It aims to improve the living conditions of disadvantaged groups while also including them in the economy. It also guides its ecosystem in this field.
- 5.5.4 Türk Telekom plays a key role in availability of information for all segments of the society and extending education to every corner of the country, thanks to its current social responsibility activities in addition to its products and services. It provides equal opportunities in access to education and information for the disadvantaged segments of society in particular.

6. GOVERNANCE STRUCTURE

Türk Telekom requires senior management's participation in reaching its goal of incorporating environmental, social and economic factors in Company activities and decision-making mechanisms along with corporate governance principles, and effectively managing the risks associated with these factors.

The Sustainability Committee, established with this approach, determines the long-term sustainability vision and strategies. The committee regularly reviews activities on sustainability and evaluates them within the scope of sustainability goals. The committee consists of executive management representatives and continues its activities under the leadership of the CEO. Investor Relations and Sustainability Department conducts the overall coordination and management of sustainability within the organisation. The Sustainability Committee may establish Sustainability Working Groups for the Company's priority issues in order to ensure that the activities are implemented effectively by the operationally responsible persons and to ensure coordination between the teams.

The Corporate Governance Committee under the Board of Directors oversees the functioning of the Sustainability Committee in order to effectively manage the risks and opportunities around sustainability.

Türk Telekom is aware of the significance of cooperating with its employees for the success of its sustainability strategy. Managers and employees at all levels contribute and support sustainability processes and take part in the implementation of the Sustainability Management System.

7. REVIEW AND REVISION

This policy is reviewed periodically once a year or when there is a notable change in internal and/or external conditions affecting the sustainability framework and revised as deemed necessary. Investor Relations and Sustainability Department conducts the review and revision.

8. ENTRY IN FORCE

This document becomes effective upon approval of the Sustainability Committee and the Board of Directors.

9. RELATED DOCUMENTS

The following policies complement the Sustainability Policy:

- Information Security Policy
- Human Rights Policy
- Business Ethics Code
- Anti-Bribery and Anti-Corruption Policy
- Procurement Policy
- Compensation Policy