Arçelik

GLOBAL CODE OF CONDUCT

MESSAGE FROM THE CEO

The founding principles of Arçelik, trust, honesty, respect, equality and transparency, continue to guide us in our journey. We continue work within the framework of code of conduct defined in line with our core values as stated by the founder of Koç Group Vehbi Koç: “Honesty, integrity, and superior business ethics are the foundations of our business conduct. We conduct our business based on good intentions, mutual benefit, and fair treatment in all our relationships.” In this context, we have updated the Global Code of Conduct, which explains how we should behave, what we should pay attention to and what behaviors we should avoid in business, in order to adapt it to our ever-growing and expanding structure. It is of critical importance to adopt these universally valid common principles. In line with our corporate vision of “Respecting the World, Respected Worldwide,” it is our responsibility to strengthen this awareness even further, to make our business even better without compromising the principle of honesty, and to create a reliable value chain. I would like you to kindly consider the Global Code of Conduct and Related Code Policies, revised with the motto of ‘Regenerated for All,’ as a guide and a reliable reference. We will continue to create value and differentiate with leading practices, thanks to your efforts to fully embrace and implement these practices.

Yours sincerely,
Hakan Bulgurlu

COMPLIANCE

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GLOBAL CODE OF CONDUCT

"Honesty, integrity, and superior business ethics are the foundations of ourbusiness conduct. We conduct our business based on good intentions, mutual benefit, and fair treatment in all our relationships. We are committed to conforming at all times to the highest ethical and legal standards."

Vehbi Koç

We designed Global Code of Conduct and related Code Policies to implement Arçelik's high ethical standards into corporate governance framework to ensure that how we do business is aligned with our values and applicable laws and regulations in countries we operate as directed by Vehbi Koç.

Our Global Code of Conduct framework has three operational pillars:

- Prevention – we work to embed a culture of integrity at all levels, in all geographies
- Detection – we encourage employees to speak up and give voice to our values
- Response – We have the tools to investigate and if necessary, sanction confirmed breaches with a standard and uniform approach, and use what we learnto continually improve.

We conduct our operations in accordance with laws and regulations, with honesty and with respect for the human rights. All our employees and Business Partners are expected to adopt these rules, act in line with them. Our leaders are responsible from settingexamples with their attitudes by leading our employees and making business decisions inaccordance with the Global Code of Conduct and related Code Policies.

Our Global Code of Conduct and related Code Policies aim to establish our standard of conduct, fight with corruption, ensure our people are respected and information is safeguarded and set the standards for external engagements.

However, Global Code of Conduct and Code Policies cannot cover every eventuality, particularly as laws differ between countries. If specific situations are not expressly covered, the spirit of the Code of Conduct and Code Policies must be upheld byexercising common sense and good judgement in light of the objective criteria.

Our Way of Doing Business

Compliance with the Law

We recognize the compliance with all relevant laws and regulations as the minimum standard globally.

We comply with the regulations in every country we operate, act according to our Code of Ethics when the regulations are unclear, and contact competent authorities when necessary.

We record all our commercial transactions and keep our records completely and clearly according to the legislation in effect, and make sure that the agreements with third parties are clear, understandable, comply with the regulations and Global Code of Conduct.

We are also aware that we must act according to the local regulations and international arrangements within the scope of the Arçelik's contractual obligations, and that any incompliance can lead to administrative penalties for the company, and that individuals may also be held liable.

Employees

We are committed to a working environment that promotes diversity and equal opportunity, equal pay for equal work where there is mutual trust, respect for human rights without discrimination. We take the Universal Declaration of Human Rights (UDHR) as our guide, and maintain a respectful understanding of Human Rights for its stakeholders in countries where we operate. We are committed to safe and healthy working conditions forall employees. We will recruit, employ and promote employees on the sole basis of the qualifications and abilities. We put the necessary effort into our employees' personal developments. We will not use any form of forced, compulsory, trafficked or child labour.We respect our employees' freedom to organize as a union and their right of joiningtrade unions.

Full compliance with Arçelik Global Code of Conduct and related Policies is the responsibility of all employees. It is the primary duty of all our employees to complete all trainings (including general and specially designed trainings for departments according to risk assessment) published within the scope of the compliance program. Employees should cooperate with the Global Compliance department in the studies to be carried out to manage the compliance risk, and in addition, they should immediately notify the Global Compliance department about additional risks they detect in their daily operations.

Consumers

We adopt an understanding towards all our consumers that is satisfaction-oriented, addressing their needs and expectations in a correct manner within the shortest time possible. We treat our customers respectfully, equally and in line with the rules of courtesy. We take complaints from our customers seriously and provide solutions thereto.

Our products will be accurately and properly labelled, advertised and communicated in accordance with the relevant regulations. All marketing activities (brand names, consumer planning, market research, trade advertising, sales materials in all forms included) must:

- Describe the performance of our products truthfully, accurately and transparently,
- Ensures there is sufficient information for our consumers, so they fully understandhow to use our products and technological implications of the product,

- Guarantee that our advertisement activities are not offensive and do not use religious, ethnic, cultural, sexual orientation, gender, age, disability or minority group discrimination,
- Not advertise in any media known for promoting violence, pornography orinsulting behaviour.

Shareholders

We aim to protect the rights and interests of all our shareholders as determined by the law. We are committed to creating business models that will increase our competitive capacity and our growth potential.We will conduct our operations in accordance with internationally accepted principles of good corporate governance.

Business Partners

We are committed to establish mutually beneficial relations with our business partners including suppliers, distributors, dealers, authorized service providers, agents and consultants. In our business dealings, we expect our business partners to act in line with our values.

Social Reponsibility, Donation and Sponsorship

We work toward "sustainable development" in social and environmental issues. We develop projects in order to improve social standards, contribute to sustainable economic growth and create employment opportunities. Considering the principle that culture, arts and sports are the most important elements in the development of a society,we contribute to the development of society we operate in by supporting various culture and art events.

In our innovations to meet consumer needs we will respect the concerns of our consumers and of society.

In order to support social development in the countries we operate, we make donations and perform sponsorship activities which conform to our principles. We carry out donation and sponsorship procedures in a transparent manner, and ensure that these activities do not contradict with Arçelik's values or commercial interests.

We do not donate to organizations that discriminate people based on gender, language, religion, race, color, age, nationality and thought differences, or sponsor such activities.

(See also **Global Donation and Sponsorship Policy**)

Political Activities and NGO's

We will co-operate with governments and other organisations, both directly and through bodies, in the development of proposed legislationand other regulations which may affect legitimate business interests. We neither support political parties nor contribute to the funds of groups whose activities arecalculated to promote political party interests. We do not use Arçelik resources (vehicle, computer, e-mail, etc.) for political activities. Political demonstrations, propaganda and similar activities are not permitted in the Arçelik premises. However, we are respectful of our employees' participation to the legal political activities voluntarily, and do not restrict them.

Arçelik strives to be a trusted corporate citizen and, as an integral part of society, to fulfil our responsibilities to the societies in which we operate.

We support our employees to take part in nongovernmental organizations. In situations that require social solidarity, we consider it as a part of social responsibility to organize publicaiding activities without concern for commercial purpose.

Creating a Healthy and Safe Work Environment

One of Arçelik's objectives is to create a healthy and safe work environment for our employees, and ensure that our Business Partners such as our business agents and distributors also create such work environments. We take all kinds of measures to this end, and provide trainings about occupational health and safety to increase awareness.

We perform our operations in a healthy and safe manner without risking the lives of our employees, contractors, distributors, and the society. Within this concept, we use safely designed facilities, work with professionals who are experts in their fields, and prioritize safety in our processes.

(See also **Global Occupational Health and Safety Policy**)

Environment

As Arçelik, we adopt the "Sustainable Development" and environmentally conscious approach as a requirement for our management philosophy. Pursuant to the principle of "'Respecting the World, Respected Worldwide" that we have adopted, we accept the liabilities we have for climate change and conservation of biodiversity.

(See also **Global Environmental Policy**)

Competition

We believe in vigorous yet fair competition and supports the development of appropriate competition laws. All companies, business partners and employees will conduct their operations in accordance with the principles of fair competition and all applicable laws and regulations. The violation of competition law may have serious consequences forboth companies and employees such as heavy fines and damage claims. In somecountries, employees may even be liable for criminal sanctions.

Arçelik co-operates fully with the competition authorities, while consistently and robustly defending its legitimate interests. All contact with competition authorities (including, where relevant, national courts) are co-ordinated by Arçelik Legal and Compliance Directorate,.

(See also **Global Competition Law Policy**)

Using Social Media Accounts

We continue to use social media, which has been growing exponentially around the world in recent years, according to our compnay principles and brand values. We are aware that personal social media accounts are a part of individuals' private lives, and respect their sharing preferences.

We are also aware of the benefit to be gained from the correct usage of social media, and the reputation risks that might be brought on Arçelik. Therefore, we avoid sharing information and images which could lead to disputes and ambiguities regarding company matters, and which could violate the companies' confidentiality rules. We make sure that we act according to the regulations, Global Code of Conduct and relevant policies in our social media posts.

Bribery and Corruption

In Arçelik, it is strictly forbidden to provide advantages to local or foreign officials and other third parties to obtain illegal benefit, regardless whether they are public servants.All our employees must comply with the local and relevant international regulations and Company policies pertaining to bribery and corruption, and we expect all our Business Partners to act accordingly. No employee may offer, give or receive anygift or payment which is, or may be construed as being, a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

We do not tolerate any kind of corruption, embezzlement, and any kind of facilitation payments or bribery, regardless of the type/manner of performance.

All accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund orasset will be established or maintained.

(See also **Global AntiBribery and Corruption Policy**)

Conflict of Interests

We expect all employees and business partners to stay away from actual and potential conflicts of interest and not to engage in any business relationship that or potentially conflicts with the interests of our company, such as personal and financial interests oroff-company activities.

If we find ourselves in a situation that can be considered as a potential conflict of interest, we shall inform our managers and the Global Compliance department to avoid possible damages such situation might cause.

Gift and Hospitality

Gift and Hospitality implementations must be legal and within the limits and amounts specified in Arçelik's Global Gift and Hospitality Policy, must not be of a nature that would affect any decision-making process in our business relations, must be occational, and in any condiiton must not give the impression of any conflict of interest.

(See also **Global Gift and Hospitality Policy**)

Anti Money Laundering

Integration of income derived from illegal activities into the financial system by creating the impression that it has been gained through legal methods is called money laundering. As Arçelik, in compliance with local and international regulations, we take necessary measures against and avoid all kinds of commercial transactions that can be seen as the laundering of proceeds of crime, and perform third party due diligence activities before entering to a business relationship. As Arçelik, we do not interact with third parties about whom we do not have sufficient information, which have negative intelligence, which pose a risk and raise doubts for these reasons.

(See also **Global Anti Money Laundering Policy**)

Global Sanctions and Export Controls

Some of the countries in which we operate impose restrictions on some countries, companies or people and there is the risk of serious sanctions such as monetary fines, cancellation of export licenses and possibility of imprisonment in case of non-compliancewith these restrictions. Therefore, we follow trade restrictions, export controls, boycott, embargo, and corruption and customs laws closely and act in compliance with such applicable laws and regulations.

In this regard, in the occurance of direct or indirect commercial relationships with persons in sanctions or embargo lists, unless necessary in which case, we first obtain the approval of the Global Compliance Department to ensure that such relationship does not constitute a violation of applicable laws or our contractual commitments.

(See also **Global Sanctions and Export Controls Policy**)

Personal Data, Privacy, and Safeguarding of Insider Information

Confidential information is protected by our company policies and applicable laws in countries we operate. We strictly adhere to company policies and procedures to protect confidential information and do not share confidential information with third parties. We protect the confidential information that we have even after we leave the company, and do not share them with third parties.

(See also **Global Protecting and Retaining Information Policy**)

As Arçelik, we use personal information of our employees and Business Partners and consumers to improve the activities and processes of our company to the extent permitted by statutory regulations. We do not share this information with third parties without the consent of the individuals or in a way that violate local laws.

(See also **Global Data Privacy Policy**)

We are aware that it is a crime (insider trading) to gain personal interest for oneself or for others by acting or transacting based on information about Arçelik traded publicly, or about the capital market instruments issued by Arçelik which could affect the prices or the values of the relevant capital market instruments or the decisions of the investors, and which have not been made public yet (“internal information”), and we inform our employees against such attempts. We take all necessary precautions to ensure the protection and confidentiality of internal information; and avoid acts and transactions which could lead to predatory practices, market fraud or insider trading in accordance with the capital market regulations.

Monitoring and Reporting

Arçelik Global Code of Conduct and Related Policies have been approved by the Board of Directors. A member of the Board of Directors has been appointed specifically to monitor the issued Policies and ongoing activities within the scope of the Global Code of Conduct practices and to inform the Board of Directors regularly..

Compliance with these principles is an essential element in our business success. Day-to-day responsibility is delegated to all senior management of the operating companies. They are responsible for implementing these principles, supported by Ethics Committees. Any breaches of the Global Code of Conduct and/or related Code Policies must be reported. Any violation of this policy will result in disciplinary action, up to and including termination of employment. The Arçelik Board of Directors will not criticise management for any loss of business resulting from adherence to these principles and other mandatory policies.

(See also **Global Code of Conduct Operations Policy**)

Provision has been made for employees to be able to report in confidence and no employee will suffer as a consequence of doing so.

(See also **Global Whistleblowing Policy**)

Version Date :15.06.2022

GLOBAL CODE OF CONDUCT OPERATIONS POLICY

1. CEO PRINCIPLE

As Code of Conduct requirements relate to the entire global Arçelik business, day-to-day accountability for Code of Conduct rests with the head of each respective geographical operation and covers all business and functional activities within that geography, the CEO carries the ultimate responsibility and accountability of the Global Code of Conduct and Related Policies.

This 'CEO Principle' applies to the Code of Conduct framework; senior management of all categories, functions and operating companies must fully support such efforts.

2. GLOBAL ETHICS COMMITTEE

Global Ethics Committee is a council consisting of CEO (Chair), CFO, Chief Legal and Compliance Officer, Chief People Officer, and relevant Assistant General Manager(s).

a. Duties of Ethics Committee

The duties of Ethics Committee are;

- Global Ethics Committee is responsible from handling all issues that take place in Turkey including the ones related to the subsidiaries in Turkey.
- Constituting an ethics culture globally,
- Creating mechanisms regarding ethics and compliance,
- Rendering ethics and compliance management as one of the essential elements of the Company globally,
- Strategically directing the Company's long-term compliance efforts.
  Global Code of Conduct Compliance Program is both managed and overseen by Global Ethics Committee in all aspects.

The Committee;

- Follow ups and inspects the activities, processes and transactions of Arçelik with an ethical point of view.
- Enables to measure the performance of ethics and compliance actions within Arçelik.
- Ensures that proper and timely investigations of the alleged violations of Code of Conduct and related Code Policies.
- Protects whistleblowers[1].
- Reviews written policies and procedures of the Company regarding ethics and compliance, makes contributions when necessary and updates on time.

[1] Please refer to the Global Whistleblowing Policy.

- Involves in the training and education of ethical cohesion and management of relevant employees and governance bodies.
- In the case that it is faced with an ethical issue which is not covered by national or international regulations, it establishes rules or principles regarding the subject.

b. Meetings

Global Ethics Committee meets at least four times each fiscal year, at least once in every quarter. Meetings may not be shorter than an hour.

In the case that a high-risk situation occurs, it is expected to come together instantaneously.

Global Compliance Manager is responsible from all meeting operations as the secretary of the Committee, he/ she does not have voting right. An agenda and any relevant pre-read material is circulated prior to the meeting. The meetings are minuted as strictly confidential.

A majority of Committee members is required for a quorum and to take any decisions.

c. Reporting

Chief Legal and Compliance Officer quarterly reports, the monthly notifications received from Global Compliance Manager, and immediately reports the notifications categorized as high risk to the Board Member Responsible from Ethics.

d. Confidentiality

The members of the Ethics Committee and all other individuals who have attended the meetings of the Ethics Committee may not disclose the information included in the reports, the contents of discussions or confidential information regarding Arçelik.

This confidentiality requirement continues to be valid after their activity ends and beyond the term of the Ethics Committee. The members of the Ethics Committee shall ensure that any employee assigned to support them likewise comply with these confidentiality requirements.

3. LOCAL ETHICS COMMITTEES

Global Ethics Committee will decide the jurisdictions of the Local Ethics Committees. Global Compliance Manager and respective Compliance Officers will ensure that the decision will be executed and it will be formed in a timely manner. Once a Local Ethics Committee is formed, it will adopt all the principles listed under the 2nd section of this Policy.

Respective Compliance Officer, who is responsible from a given Local Ethics Committee, will periodically share all relevant documents -in English- of their Committees with the Global Compliance Manager.

Local Committees may not handle issues related to their top managers. Such issues will be handled by the Global Ethics Committee.

4. COMPLIANCE OFFICER

Each Compliance Officer must have the authority and seniority to credibly perform their role. All members of the committees, both Global and Local, will respect the independence of the role and support Officers when they conduct their duties. Independence provided to the Compliance Officers includes freedom on investigative steps with guidance from Ethics Committees.

Responsibilities of Compliance Officers are as follows:

- Ensuring independent risk assessment and delegating the relevant Ethics Committee the subject received by the whistleblowing process or shown up through ordinary risk assessment process within a maximum of 6 workdays,
- Making suggestions for remediation and improving business processes in line with the Global Code of Conduct and related Code Policies.
- Defining high risks and immediately escalating the issues. Direct escalation process for Global Compliance Manager is to Chief Legal and Compliance Officer, for Compliance Officers is to Global Compliance Manager.
- Deciding on the actions to be taken with the guidance of the Ethics Committee and providing necessary actions to be taken within 60 days and concluding.
- Periodically evaluating the policies of the company in case of any amendment in processes by considering the national and international practices and requesting related Compliance Officer to follow up the issue.
- Export / Import Control: Compliance Officer(s) must ensure that new business partners are not involved in the list of parties subject to national or international sanctions and / or embargoed countries before setting up the relationship and during.

5. GENERAL PRINCIPLES OF INVESTIGATIONS AND PENALTIES

a. Proportionality & Transparency

An employee can be punished, only, in direct proportion to the breach he/she committed. In the implementation of the penalty, aggravating and mitigating factors[2] must be taken into consideration.

b. Confidentiality

It is essential that all investigations are carried out in strict confidentiality. Supervisors and investigators who carry out the investigations are obligated to protect the integrity of the whole process and take necessary actions, if they identify individuals who are violating the privacy of investigations. Such a breach of confidentiality will constitute a sanctionable offense under the Global Code of Conduct framework.

c. Preventing Double Jeopardy

An employee cannot be punished more than once because of the same offense. If the same action is repeated it must be taken into consideration as an aggravating factor.

[2] Please refer to Annex1

d. Equality & Consistency

Different penalties cannot be imposed among employees, who perform the same action as substantiated Global Code of Conduct and related Code Policies breaches. The only differentiation that may take place based on the specific facts of the given incident by applying mitigating and aggravating factors.

The penalties defined in this Policy solely relate to substantiated breaches of the Global Code of Conduct and related Code Policies. They are independent of any performance-related, business evaluations.

6. PENALTIES

Acting against the Global Code of Conduct and related Code Policies may lead to termination of the employment contract. When such a breach determined investigated and substantiated; nature of the event incurred and repetitiveness of the behavior will be considered as aggravating or mitigating factors.

Consequences of a substantiated breach are given below:

a. Further education and/or coaching,

b. Verbal Warning documented and placed in the employee's (HR) file,

c. Written Warning placed in employee's (HR) file,

d. Written Warning and appropriate financial consequence as legally possible; downgrade in performance rating for the year, and calculation of the premiums accordingly,

e. Termination of employment

f. Termination of employment and legal action against the employee(s) who breached the Code of Conduct.

Any employee who is sanctioned in accordance with this Policy may not receive a promotion and transfer request for another position. In other words, such sanction freezes all HR procedures for the individual for the given year.

Termination is the default sanction for the substantiated Global Code of Conduct framework violations. The decision to apply a more severe or more lenient sanction must be supported by evidence of relevant mitigating and aggravating factors as set out in the Appendix I and documented accordingly.

7. INVESTIGATION AND DECISION MAKING PROCESS

Once an allegation is received it should immediately be reviewed and an initial analysis of the allegations conducted by the relevant Compliance Officer. Where appropriate Compliance Officer should consult the Global Compliance Manager to determine whether an investigation is required and, if so, who should be part of the investigation team.

All investigations of a suspected Code of Conduct breaches are lead, overseen by a Compliance Officer. Investigations may be handled by the Compliance Officers, Internal Audit Department or can be handled by receiving external forensic investigation services.

In instances where the person(s) raising a complaint and person(s) alleged to have breached the Code of Conduct are based in different locations, the default approach is that the Compliance Officer and Ethics Committee from the geography where the person(s) alleged to have breached the Code of Conduct is based lead the investigation.

Where a Global Code of Conduct allegation concerns a top manager, Chief Legal and Compliance Officer himself/herself oversees the investigation. Local Ethics Committees may not handle cases related to their own top managers.

The Compliance Officer(s) must submit to the relevant Ethics Committee an investigation report that clearly links relevant allegation(s) to the specific requirements of the Code of Conduct, summarizing the evidence, findings and recommended penalties.

The Committee then determines individual penalties. In determining whether an employee breached the Code of Conduct, the Committee should decide, with support from the Compliance Officer in weighing up the evidence, whether it is more likely than not that a breach occurred. In all circumstances where it agrees that a Code of Conduct breach is substantiated, the Committee determines the appropriateness of the penalty recommended by the Compliance Officer.

When deciding on a penalty the Committee should consider individual circumstances and related aggravating and mitigating factors. While there is always an element of judgement involved, this must be applied in good faith to ensure a transparent, suitably objective, consistent and fair approach to determining sanctions.

Line managers who are members of the Committee may take part in the case review and decision-making process relating to members of their team. Any Committee member may however step out of proceedings where it is agreed their participation may adversely affect these (e.g. because of a conflict of interest).

Under no circumstances are the following elements to be considered in determining the appropriate sanction:

a. the overall high or low performance of an individual employee;
b. the fact that an employee is a member or representative of a union.

8. DISCIPLINARY COMMITTEES

The Disciplinary Committees that are established due to the collective employment contracts and/or local legal requirements are responsible for ensuring that the disciplinary actions are taken in accordance with local regulations, laws and collective labor agreements. When/if there are issues that are also violating the Global Code of Conduct and related Code Policies handled by the local Disciplinary Committees, Compliance Officers must be informed about such issues to ensure consistency and transparency.

Since Compliance Officers are employees of the Company appointed by the Chief Legal and Compliance Officer of Arçelik as being responsible for monitoring the Company's operations pertaining to this Policy, related Compliance Officers should be informed about the decisions of the Disciplinary Committee at all times.

9. LOCAL LEGAL REQUIREMENTS

This Policy will be applied considering local legal requirements that may require deviations. If such a deviation occurs, it must be fully explained in the investigation report.

10. AUTHORITY AND RESPONSIBILITIES

This Policy is published by Arçelik Legal and Compliance Department, and the Company is responsible for ensuring the compliance with the Policy by all its employees.

Compliance Officers are employees of the Company appointed by the Chief Legal and Compliance Officer of Arçelik as being responsible for monitoring the Company's operations pertaining to this Policy.

This Policy will be periodically reviewed by the assigned Legal and Compliance Department to ensure compliance with new or revised laws and regulations.

ANNEX1 -

Elements to Consider	Mitigating Factors	Aggravating Factors
Intention and Planning	• No intention to commit breach • Action reflects a spontaneous oversight or mistake • Coercion by management to act in violation of the Code of Conduct • Sought advice of guidance but this was not provided, unclear or wrong	• Clear intent: wilful and deliberate • Action was planned • Coercion of others to act in violation of the Code of Conduct • Retaliatory threats against others for raising any concerns • Ignored advice provided
Employment status and awareness of the Code	• New to company [<6 months] • Junior role with no authority • Long-serving employee with a strong record of integrity	• Manager or above with leadership responsibilities •Prior mandated Code of Conduct education was provided but not taken or intentionally ignored • Not the first breach
Conduct and co-operation	• Voluntarily reported the violation • co-operated fully with investigation • Acknowledged personal failures: high degree of contrition • First offence under the Code of Conduct	• Denial of issues • Attempts to obstruct investigation • No acknowledgement of any personal failures or contrition • Poses a continued risk of harm to Arçelik or its employee(s)
Impact	• No financial loss to Arçelik • No other adverse consequences to Arçelik, its employees or third parties	• Material financial impact • Personal gain • Adverse consequence to Arçelik, its employees or third parties including exposure to external investigation

GLOBAL WHISTLEBLOWING POLICY

1. GENERAL PRINCIPLES

Arçelik is committed to sustain the highest possible ethical standards and legal conduct within the Company's business operations. In order to maximize and maintain the Company's ability to effectively manage the reporting mechanism, any employee who believes reasonably that a potential breach of Global Code of Conduct and related Code Policies exists in the work place, then he or she should report this issue immediately to the ethics hotline.

The whistleblowing mechanism can be used covering possible improprieties to unethical acts such as;

- Breach of Global Code of Conduct and related Code Policies,
- Unlawful acts or orders requiring violations of a law, mismanagement, abuse of the current job position, significant hazards to public health or safety,
- Failures to comply with statutory obligations in countries that Arçelik has operations,
- Any other activity which subverts the Company's operations.

2. PRINCIPLES

a. Definition of Whistle-blower

A whistle-blower is anyone who communicates an allegation or any other information indicating that acts which are incompliant to the Global Code of Conduct and related Code Policies.

b. Protection of the Whistle-blowers

The harassment or victimization of anyone raising a concern is not tolerated and individuals making a disclosure will retain their anonymity unless they agree otherwise. Arçelik will not try to discover the identity of the anonymous whistle-blowers.

Allegations and concerns notified anonymously shall be considered by Compliance Officers fairly and properly in accordance with the Global Code of Conduct and related Code Policies.

Whistle-blower's identity protected by the Compliance Officers unless;

- The whistle-blower agrees to be identified,
- Identification is essential to allow the appropriate law enforcement officials to investigate the issue or answer the disclosure efficiently,
- Identification is needed by law.

Compliance Officers are authorized to protect the identity of the whistle-blowers even from the Ethics Committee members if such protection is requested.

We are fully committed to protect whistle-blowers and there will be zero tolerance towards to the acts aimed to put whistle-blowers in unfavourable positions by any act or omission regarding the whistleblowing, in particularly in relation to:

- employment procedure;
- education, training, or professional development;
- promotion at work, evaluation, acquiring or loss of the title;
- disciplinary measures and penalties;
- working conditions;
- termination of employment;
- earnings, compensation of earnings;
- payment of the bonuses and of the retirement gratuity;
- disposition or transfer to the other work assignments;
- failure to take measures to protect because of the harassment by other persons;
- a referral to the mandatory medical examination or referral to the examination to assess the work ability.

c. Reporting Channels

Allegations or concerns can be reported through the Ethics Hotline, which is administered by an independent, third-party provider with confidentiality. Ethics Hotline service providers informs only -related Compliance Officers to enable proper handling of the concern.

When reporting via the Ethics Hotline, whether via the Web or the Phone, the informant may;

- Want not to share his/her name and contact information to remain anonymous,
- Share his/her name and contact information with the service provider and allow the information to be communicated to Arçelik. In this case, Arçelik can contact the informant directly to request any information needed during the investigation.
- Want to share his/her name and contact information only with the service provider, but not to share with Arçelik. In this case, Arçelik can contact the service provider to request additional information when needed.

The reporting channels are webtool (www.ethicsline.net) and Hotline Phone Numbers as listed in the web site:
https://www.arcelikglobal.com/en/company/about-us/global-code-of-conduct/

3. PROPER USAGE OF THE ETHICS HOTLINE

It should be noted that the Ethics Hotline is not an Emergency Service. It must not be used to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If emergency assistance is required, local authorities and Company representatives must be contacted.

4. AUTHORITY AND RESPONSIBILITIES

This policy is published by Arçelik Legal and Compliance Department, and the Company is responsible for ensuring the compliance with the Policy by all its employees. Any violation of this Policy will result in disciplinary action, up to and including termination of employment.

Compliance Officers are employees of the Company appointed by the Chief Legal and Compliance Officer as being responsible for monitoring the Company's operations pertaining to this Policy.
This Policy will be periodically reviewed by the assigned Arçelik Legal and Compliance Department to ensure compliance with new or revised laws and regulations.

Version Date: 17.10.2022

GLOBAL ANTI BRIBERY AND CORRUPTION POLICY

Through this Policy, Arçelik aims to declare its commitment to prohibiting bribery and corruption and to be in compliance with applicable anti-bribery laws and guiding for identifying and avoiding potential bribery and corruption actions to preserve its integrity and reputation.

1. DEFINITIONS

Bribery: A propose to give or receive “anything of value” with the aim to corruptly influence or obtain improper advantage over a business transaction or relationship.

a.Improper advantage is an advantage to which Arçelik and/or its business partners are not explicitly entitled.

b.Corruptly influence means providing an offer, payment, or promise with the aim of impacting others to take advantage of their official position for Arçelik’s or one of Arçelik’s business partner's benefit.

Business Courtesy: A Business Courtesy is any kind of gift or hospitality (meal, travel or hospitality) provided for a business purpose or associated with a business event.

Charitable Contributions: Voluntary contributions to any organization, either in kind or in cash without expecting any benefit.

Facilitation Payment: In order to expedite a routine service it is an unofficial, improper, small payment made to secure or accelerate the legitimate operation of the paying party.

Sponsorship: Any action which is to make any cash or non-cash payment for the activities that are organized by an individual, professional organization or entity with an expectation that it will provide benefit for Arçelik.

The UN Global Compact: is a global pact initiated by the United Nations (UN) 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.

Public Official: It is broadly defined to involve a variety of individuals, including but not limited to the followings:

- Employees working at government bodies (such as public officials, policemen)
- Employees of government business enterprises
- Employees of political parties, political candidates
- Any person who is at a legislative, administrative or judicial position in a country
- Any person who fulfils a public service for a country
- Judges, jury members or other officials who work at international or supranational courts or foreign state courts;
- Members of the international or supranational parliaments; individuals who carry out a public duty for a foreign country, including public institutions or public enterprises;
- A citizen or foreign arbitrators who have been entrusted with a task within the arbitration procedure resorted to in order to resolve a legal dispute;
- Officials or representatives working at international or supranational organizations that have been established based on an international agreement.

Forms of Value:
The following examples run the risk of being perceived as potentially providing improper benefits;

- Gifts, Hospitality[3]
- Hiring Family Members of Public Officials
- Donations, sponsorships and other Types of Value – (Tickets for sports activities, rebates, samples, free goods, and other trade and merchandising programs.)

Politically Exposed Persons: refers to individuals who are or have been entrusted with prominent public functions, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials, senior management of the international organizations, and family members and close associates of such persons

2. GENERAL PRINCIPLES

Arçelik, which is affiliated with Koç Holding A.Ş., is a signatory party to the UN Global Compact, by which it is aimed to work against corruption and bribery all over the world. Within this view, Arçelik does not permit or accept the bribery in any form. Independent from local practices or regulations, Arçelik does not tolerate any kind of bribes, corrupt payments, facilitation payments, or inappropriate gifts and entertainment to anyone involved in Arçelik's business cycle.

Arçelik acts in compliance with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act ("UKBA"), and the local laws in every country in which Arçelik operates.

Legal and Compliance Directorate defines anti-bribery-related trainings on an annual basis to Arçelik employees and monitors their completion without delay.

Incompliant actions may result Arçelik to be punished through several measures including but not limited to the followings: invalidation of the licenses granted by the public authorities; seizure of the goods which are used in the commitment of, or the resultof, a crime by the representatives of a legal entity; Administrative and/or penal sanctions on Arçelik employees and seizure of financial benefits arising from or provided for the commitment of a crime. and most importantly, exposes firstly Arçelik and Koç Group to significant reputational harm.

This Policy can be supplemented with the local obligations which are more stringent than the obligations stated in this Policy to comply with local laws or regulations.

3. RULES

a. Gifts, Meals, Travel and Hospitality

Providing or accepting gifts, meals, travel, or entertainment to effect any party inappropriately, especially a Public Official, in exchange for any improper benefit is strictly prohibited. Under some specific conditions, providing gift to a Public Official or accepting a gift from a third party may be allowable as described in Global Gift and Hospitality Policy[4].

[3] See Global Gift and Hospitality Policy.
[4] See Global Gift and Hospitality Policy.

b. Hiring or Engaging Public Officials

Employment decisions must be based on virtue and this should not inappropriately influence Public Officials. There must be approval before proceeding with the recruiting process, if a known family member or designee of a Public Official is seeking employment at Arçelik.

Public Officials and Politically Exposed Persons can be hired or engaged to perform services that have a legitimatebusiness purpose by Arçelik, provided that:

- There is no expectation that the person is being retained by the Company in exchange for any improper action or business advantage from the government,
- The person/s is/are objectively qualified enough in terms of the criteria required for the related position,
- The salary or fees are reasonable and consistent with the work and the related person's professional qualifications,
- Prior approval is obtained from the Sustainability and Corporate Affairs Directorate and Chief Legal and Compliance Officer.

Arçelik's employees and business partners are prohibited from making facilitation payments on behalf of a Arçelik.

c. Grants, Donations and Sponsoring

Providing a grant/donation/ sponsorship to improperly effect a Public Official, or inreturn of any improper favor is prohibited by this Policy.

Providing a donation to any political party on behalf of Arçelik or under any other name, in kind, or in cash is prohibited. Donations and Sponsorships can only be made in line with the rules and principles set forth in the Arçelik Global Donation and Sponsorship Policy.

d. Third Party Relationships

Applicable laws regarding bribery and corruption do not permit any kind of improper payments made directly by Company employees or indirectly through an agent, consultant, distributor, or any other third-party representative acting for or on behalf of Arçelik (collectively, "Third Parties").

Third Parties must be in accordance with this Policy, at all times. To mitigate the risk of bribery and corruption, a risk-based due diligence on third parties must be conducted, both before and throughout the business relationship. The risk based due diligence on prospective joint venture partners, acquisition targets, and other strategic investments must be conducted to mitigate corruption related risks.

Arçelik must engage Third Parties only if;

- a legitimate business need is in place for the services or the goods provided,
- the price of the services and goods are not above market value,
- the Third Party is evaluated as appropriate after application of due diligence process from an anti-bribery and corruption perspective.

No relationship should be established with a Third Party who has or will have a substantive interaction with Public Officials on behalf of Arçelik without an inquiry into the third party's background, qualifications and reputation.

A written contract made with Third Parties acting on behalf of Arçelik including an appropriate language regarding all applicable anti-bribery and corruption laws should be in place.

e. Transparency and Accuracy of the Books and Records

The failure to keep accurate and transparent books and financial records breaches many countries' laws even when no bribery action is in place. Thus, for each transaction, principles regarding internal controls, financial reporting, document retention should be taken into consideration and it should be ensured that Arçelik demonstrate its compliance with anti-bribery laws and regulations. To this end;

- All kinds of accounts, invoices and other documents created from dealing with third parties (customers, suppliers, etc.) should be recorded to the books, timely and accurately, including clear explanations so that a third party reviewer can be able to understand the business rationale behind the transactions,

Any alteration falsifying the nature of any transaction is prohibited on accounting or similar commercial records.

4. AUTHORITY AND RESPONSIBILITIES

This Policy is published by Arçelik Legal and Compliance Directorate, and the Companyis responsible for ensuring the compliance with the Policy by all its employees. In addition, regarding the Company's position for corrective and/or preventative actions, including termination of employment, against any non-compliant behaviors should be considered regularly via related parties.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Arçelik Global Code of Conduct, you may report the incident to to the Compliance Officers via;

Web: www.ethicsline.net

You may reach the Ethics Hotline Numbers from the web page below;
https://www.arcelikglobal.com/en/company/about-us/global-code-of-conduct/

Compliance Officers are employees of the Company appointed by the Chief Legal and Compliance Officer of Arçelik as being responsible for monitoring the Company's operations pertaining to this Policy.

If there is a discrepancy between the local regulations, applicable in the countries where Arçelik operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.

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.

This Policy will be periodically reviewed by the Arçelik Legal and Compliance Directorate to ensure compliance with new or revised laws and regulations.

Version Date: 15.06.2022

GLOBAL GIFT AND HOSPITALITY POLICY

1. APPLICATION

This Policy contains rules that are applicable to all Arçelik employees, their close relatives and/or third parties affected by our company's activities and affecting our company by their activities. (i.e., non-governmental organizations, the media,employees, partners, shareholders, suppliers, authorized service providers, agents, consultants) acting on behalf of Arçelik employees.

Gift or Entertainment activities (including descriptions, approval processes) must be documented properly and the related transaction must be accurately and transparently recorded to the books and records.

2. GENERAL PRINCIPLES

Under certain circumstances exchanging gifts and hospitality are acceptable and commonly used to increase the strength or maintain business relationships among business associates.

This Policy applies to the situations when:

- Arçelik employees give or accept gifts to third parties to represent Arçelik in business context (Personal gifts are not the concern of this Policy)
- Arçelik employees invite individuals who are not Arçelik employees to hospitality events to represent Arçelik in business context and when Arçelik employees receive hospitality invites from third parties because of their professional capacity to represent Arçelik (personal hospitality and hospitality organizations within Arçelik employees are not the concern of this Policy).

In some certain circumstances, giving or receiving meals, small company events and tickets to sports and cultural events may be considered acceptable if they occur occasionally and do not exceed a certain amount per thresholds. In this respect, we acknowledge that dealers, authorized services and distributors can be invited to the sports events that we have sponsorship arrangements for our brands, on the condition that these invitations are made as a reward basis and the list of such guests are duly informed to the relevant director.

However, if offers of gifts, hospitality or travel are frequent or of substantial value, they may create potential conflicts of interest between parties, or result in non-compliance to local or global laws and regulations. Consequently, giving or receiving gifts and hospitality activities to/from third parties can only be granted when no counter benefit is expected and there is no impression of such, the activity is recorded in the books and records accurately and transparently, and is in compliance with generally accepted business practices and applicable legislation..

When setting up the relationships with third parties, including, but not limited to: customers, vendors the following criteria must be considered (please refer to the rules related to Governmental Organizations, Government Officials and Politically Exposed Persons when needed).

The gift or hospitality must not be in the form of cash, cash equivalents services or the promise of employment.

The decisions to give/receive a gift or hospitality must **NOT**:

- influence any decision-making process impacting Arçelik's business;
- be designed to obligate an individual to act improperly with regard to Arçelik's business;
- influence, or reasonably give the appearance of influencing, Arçelik's business relationship with the third party;
- affect Arçelik's independence, performance and ability to make decisions
- be intended to result in obtaining or sustaining business or providing an improper financial advantage to Arcelik and/or the third party, such as favorable tax treatment or the award/maintenance of business.

The gift or hospitality or their nominal values must **NOT**:

- be prohibited by laws, regulations (including but not limited toFCPA, UKBA, local laws) or Arçelik's Anti Bribery and Corruption (ABC) Policy (such as bribes, facilitation payments, payoffs, etc.);
- damage the integrity and reliability of Arçelik's business relationship with the third party;
- bring Arçelik into disrepute if disclosed publicly;
- be given, or received, during a tender or competitive bidding process;
- be perceived as bribery[5] , facilitation payment or commission;
- correspond to a privileged treatment carrying out a certain task.

3. GIFTS

While giving and receiving gifts line managers should always be informed through company e-mail.

a. **Monetary Limit for Gifts:** While giving and receiving gifts, employees must ensure the value of the gifts do not exceed USD 50 from single source[6] and are always one-off (not more than once a year) or irregular in nature. On the other hand, regardless of the monetary limit specified, any Gift that may adversely affect the ability to make a fair and impartial decision or be considered contrary to generally accepted commercial practices should be rejected even if it falls below the limit specified in this article, and such Gifts should not be given to third parties as well.

b. **Receiving Gifts Beyond the Limit:** If an employee receives a gift value more than USD 50 he/she must immediately inform respective Compliance Officer. Compliance Officer will work with the recipient of the gift together to decide either to return the gift to the sender or to take it from the recipient, keep it and record it properly. If appropriate sender will be informed regarding Arçelik Gift and Hospitality rules with a kind thank you note.

c. **Giving Gifts Beyond the Limit:** If an employee is in need to give a gift valued more than USD 50 he/she must receive the preapproval from the relevant ComplianceOfficer. Giving Arçelik small household appliances should be primarily considered.

[5] Please refer to the Global Anti Bribery and Corruption Policy.

[6] "Single source" covers all the related parties including but not limited to customers, suppliers, authorized representatives, managers or staff of these parties

4. HOSPITALITY

a. **General:** Business hospitality sometimes plays a key role in strengthening the business relationships withthird parties. Arçelik employees may accept or provide hospitality for permitted business purposes such as building good faith and improving relationships with third parties.
Giving or receiving hospitality is permitted only if such hospitality:

- is occasional (such as attendance at sports, theatre, or other cultural events)
- is not given/accepted as a bribe, facilitation payment or pay off
- does not create a perception that the individual giving the gift is entitled to; preferential treatment or a discount
- complies with any specific limits defined under this policy unless the lower limits are set by local laws and regulations

b. Prohibitions: The following types of hospitality are never accepted or provided from/to third parties at any time:

- hospitality that can be perceived as immoderate in the conditions of the business event,
- activities that do not comply with Global Code of Conduct and the Related Code Policies or the culture of the countries in which the gifts are provided hospitality which do not comply with local/national laws and applicable regulations in the countries in which the hospitality is accepted or provided,
- hospitality that can be perceived as extreme by an objective third party,
- hospitality that can be for the personal gain or benefit of an employee, family member or close associate,
- hospitality that exceeds any specific limits defined under this Policy unless the lower limits are set by local laws and regulations.

c. Monetary Limits for Hospitality:

- Upper management: USD 200 per person
- All other employees (except upper management)

i. Turkey: 1000 TL per person
ii. Other Countries: USD 70 per person

d. Record Keeping: Employees must keep their own records for inspection and ensure expenditure associated with any hospitality provided by, or on behalf of Arçelik. Records related to hospitality must contain the names of the participants and organizations that they represent for audit purposes.

Employees providing the Entertainment activities are responsible to submit the supporting documentation to be retained by the accounting department .

e. Approval: Line Manager's preapproval should be received via company e mail account, before a hospitality takes place. In addition, if a hospitality valued more than the limit takes place, line manager's approval should be received.

5. OUT OF SCOPE GIFTS

It is ordinary for some of Arçelik's suppliers, customers and other third parties to give or receive invaluable gifts/presents, such as promotional items key holders with a total value under the specified limit regarding receiving and giving gifts, to employees within the scope of their business operations. When giving or receiving these gifts it mustbe verified that they have not been offered to influence an employee's judgement or could reasonably be perceived as having the ability to influence their judgment.

Arçelik employees may give or receive gifts to/from third parties provided that the gift:

- does not lead an understanding that the party, who provides gift, obtains special and differential treatment, an award of business, better prices or favored terms of sale,
- gift is not for personal gain or benefit of an employee, family member or close associate.

Employees should share the edible gifts with their team members and consume them at the workplace.

Flowers are considered out of scope of this Policy.

6. GOVERNMENTAL ORGANIZATIONS, GOVERNMENT OFFICIALS AND POLITICALLY EXPOSED PERSONS

As most of countries in which Arçelik operates prohibits offering anything of value to Government Officials[7] or Politically Exposed Persons[8] to gain or sustain a business, maximum care must be taken at all times.

Giving a gift/present or hospitality to a Government Official is **ONLY** allowed if;

- the transaction is compliant with the local laws and regulations,
- the gift or hospitality is not, or is unlikely to be perceived as, a bribe or payoff
- the reason of giving the gift/present or hospitality is well described and documented with containing proper preapprovals of Sustainability and Corporate Affairs Director and Compliance Officer
- Compliance Officers are required to inform Global Compliance Manager before a decision of approval provided in the country level.
- the value and the frequency of the gift or hospitality must be nominal and not excessive,
- the transaction is properly recorded to the accounting books and records.

[7] Government/Public Official is broadly defined to involve a variety of individuals, including but not limited to the followings:

•Employees working at government bodies (such as public officials, policemen)
•Employees of government business enterprises
•Employees of political parties, political candidates
•Any person who is at a legislative, administrative or judicial position in a foreign country
•Any person who fulfils a public service for a foreign country
•Judges, jury members or other officials who work at international or supranational courts or foreign state courts;
•Members of the international or supranational parliaments; individuals who carry out a public duty for a foreign country, includingpublic institutions or public enterprises;
•A citizen or foreign arbitrators who have been entrusted with a task within the arbitration procedure resorted to in order to resolve alegal dispute; and
•Officials or representatives working at international or supranational organizations that have been established based on aninternational agreement.

[8] Politically Exposed Persons refers to individuals who are or have been entrusted with prominent public functions, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials and family members and close associates of such persons..

7. ROLES AND RESPONSIBILITIES

Arçelik Gift and Hospitality Policy is published by Arçelik Legal and Compliance Directorate and the Company is responsible for ensuring the compliance with the Policy by all its employees and all third paties' in their transactions with Arçelik. Arçelik takes all necessary actions to ensure the compliance within this regard. Any violation of this Policy will result in disciplinary action, up to and including termination of employment. If this Policy is violated by third parties, their contracts may be terminated.

If there is a discrepancy between the local regulations, applicable in the countries where Arçelik operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, shall supersede.

In addition, regarding the Company's position for corrective and/or preventative actions against any non-compliant behaviors should be considered regularly via related parties.

If you become aware of any action you believe to be inconsistent with this Policy, the

applicable law or Arçelik Global Code of Conduct, you should report this incident

via the below mentioned reporting channels:

web: www.ethicsline.net

Hotline Phone Numbers as listed in the web site:

https://www.arcelikglobal.com/en/company/about-us/global-code-of-conduct/

Compliance Officers have been appointed by the Chief Legal and Compliance Officer of Arçelik to be responsible for monitoring the Company's operations regarding this Policy.

This Policy will be periodically reviewed by the assigned Legal and Compliance Department to ensure compliance with new or revised laws and regulations.

Version Date**:** 07.06.2023

GLOBAL COMPETITION LAW COMPLIANCE POLICY

1. PURPOSE AND SCOPE

The purpose of this Competition Law Compliance Policy ("the Policy"), which is an integral part of the Arçelik Global Code of Conduct is to set the principles and rules for the conduct of all activities within the Arçelik in compliance with competition law. This Policy aims to ensure that all processes and practices of Arçelik comply with competition law and to raise awareness on competition law. This Policy is an indication of importance that Arçelik acts in accordance with competition law while conducting its commercial activities and relations with competitors.

All employees, directors, officers of Arçelik shall comply with this Policy. Business Partners are also expected to act in accordance with the principles of this Policy to the extent applicable to the relevant transactions.

2. DEFINITIONS

“Abuse of Dominant Position” is defined as the abuse of the dominant position by undertakings to restrict competition in the market. Examples of these practices include obstructing competitors in the market, preventing undertakings entering the market, refusing to supply goods and services, discriminatory practices, making the sale of one product conditional on the sale of another product and applying excessive pricing.
"Anti-Competitive Agreement" refers to express or implied agreements between undertakings, which may be written or oral, and cover issues such as price determination, determination of production amount, market and customer sharing.
"Business Partners" includes suppliers, dealers, authorized services; all kinds of representatives, subcontractors and consultants acting on behalf of the company.
“Competition” is the contest between undertakings in markets for goods and services, which enables them to take economic decisions freely,
"Competitively Sensitive Information" refers to any information that, if shared with competitors, may distort, restrict the competition and/or cause this effect which includes, but not limited to, information on price, quantity, customers, costs, turnover, sales, purchases, capacity, product qualifications, marketing plans, risks, investments, technologies, innovation and R&D programs and other similar information.

“Concerted Practice” refers to direct or indirect relationship that provides a coordination or practical cooperation that replaces the independent behaviour of the undertakings, where there is no agreement between undertakings.

“Dominant Position” means the power of one or more undertakings in a particular market to determine economic parameters such as price, supply, the amount of production and distribution, by acting independently of their competitors and customers.
"Arçelik" refers to all companies controlled directly or indirectly by Arçelik A.Ş., individually or jointly, and the Joint Ventures included in the consolidated financial report of Arçelik A.Ş.
“**Undertaking”** is a natural and legal person who produces, markets and sells goods or services in the market, and a unit which can decide independently and constitute an economic whole.

3. GENERAL PRINCIPLES

Arçelik employees and Business Partners are expected to carry out their business in accordance with the law in countries where they operate, Arçelik Global Code of Conduct and this Policy. Acting in accordance with competition law regulations is a crucial part of the duties and jobs of all managers and employees.

Arçelik,

- regularly monitors the compliance of its activities with the competition law.
- takes necessary actions regarding the management of competition law compliance risk.
- carries out necessary training and supervision activities to raise the awareness of employees and managers regarding competition law.

Within the framework of this Policy, Arçelik employees, managers and Business Partners are required; not to be engaged in Anti-Competitive Agreements and Concerted Practices with competitors, not to act in line with the anti-competitive decisions of the association of undertakings, not to share information that may cause inconveniences with competitors in terms of competition law and to act carefully regarding the Abuse of Dominant Position.

Violation of this Policy may result in serious consequences, for Arçelik , managers, employees and its Business Partners, including legal, administrative and criminal sanctions depending on the legislation in the region of operation, and most importantly, this may seriously damage to the reputation of the Arçelik Group.

4. APPLICATION OF THE POLICY

4.1 Rules to Be Considered in Relationships with Competitors

It is forbidden to make agreements or engage in behaviours having the nature of Concerted Practices, with a competitor company manager or employees which have as their object or effect or likely effect the prevention, distortion or restriction of competition directly or indirectly. Anti-Competitive Agreements with competitors such as allocation of customers and territories, restricting the amount of supply and bid rigging are also prohibited.

Attention should be paid to the language used in in-company correspondence and interaction with competitors and Competitively Sensitive Information must not be shared with them.

Particular attention must be taken in any contact with the employees of competitors. In meetings where competitors come together such as associations, councils, trade associations; in the case of anti-competitive speeches by others, such sharing must be immediately warned, if the speeches continue the meeting must be abandoned and this situation must be recorded. Arçelik Legal and Compliance Director must be informed concerning what needs to be done afterwards.

Arçelik Legal and Compliance Director must be consulted before responding to requests from competitors that carry the risk of violation of competition rules; it must not be kept silent and the parties should be informed in written that such requests are not compatible with competition rules, the request cannot be answered positively, and the Company cannot be a party to such an agreement.

Information regarding competitors; could be, in accordance with the law, obtained from publicly available sources such as press releases, public annual reports, official records, trade journals, speeches by company executives. If these sources which contain information about competitors in presentations, reports and similar documents prepared by the company are used; the legitimate source of this information must be clearly and explicitly stated.

4.2 Rules to Be Considered in Case of Dominant Position

Arçelik may have a Dominant Position in the different markets in which they operate. In this case, employees carefully carry out their activities in accordance with the requirements of the Dominant Position. Although the determination of dominant position is evaluated separately for each market based on the market shares of undertakings, competitors and some specific factors, Arçelik should avoid the following practices that can be regarded as an abuse if they are in a position that can be considered as dominant in a market in which they operate:

- Implementing pricing strategies that exclude competitors from the market or discriminate against specific customers such as offering non-objective loyalty discounts to increase the number of sales.
- Requiring the purchase of one product conditional on the purchase of another product.
- Refusal to provide goods or services without objective grounds.
- Conduct activities to prevent competing undertakings operating in the market or seeking new entry into the market.
- Providing different terms for similar acts to equal buyers.
- Imposing excessive pricing and/or offering contracts that contain unfair commercial terms.
- Signing long-term exclusivity agreements. (Time restrictions concerning this subject may vary depending on the market of the relevant service/product. Arçelik Legal and Compliance Director must be consulted, prior to signing such agreements.)

4.3 Rules to Be Considered in Relationships with Customers, Dealers and Suppliers

Employees and managers of Arçelik respect the freedom of dealers and authorized services in the sector in which they operate to set their own sales prices, profit and discount rates, and strictly avoid any actions and statements that may create the impression that this freedom is restricted. They ensure that anti-competitive activities, particularly in terms of region or customer restrictions, are not carried out within the scope of the distribution system applied, and act within the framework of agreements that comply with competition rules in its relations with suppliers.
Being aware of the fact that dealers, authorized services and suppliers are competitors of each other, it should be careful against all kinds of statements and actions that may constitute Competitively Sensitive Information, Concerted Practices or Anti-Competition Agreement between these undertakings, and necessary warnings should be made to the relevant parties to avoid such interaction.

4.4 Mergers, Acquisitions and Joint Venture Transactions of Companies

The merger of two or more companies or the change in control of a company in whole or in part (through the purchase of shares or assets), or the establishment of a joint venture may, in certain conditions, be subject to the permission of the competition authorities. The transaction that are subject to notification are completed without the authorization of competition authorities; this creates a risk that the transaction could be legally invalid and/or administrative fines are imposed. In the preliminary stages of a planned merger, acquisition or joint venture transactions by Arçelik , before signing any contract or a written commitment, Arçelik Legal and Compliance Director and the Legal and Compliance Department of Koç Holding must be informed in order to carry out the necessary assessment.

4.5 Use of Press, Media and Other Social Communication Channels

Employees and managers of Arçelik act very carefully in their posts in press, social media and other communication channels as a part of compliance with the Policy. In terms of exchanging Competitively Sensitive Information with competitors, these channels are places to be extremely crucial. Undertakings should avoid, through such channels, sharing one-sided information sharing with competitors such as future price, stock and campaigns that may be qualified as Competitively Sensitive Information.

4.6 Communication with Competition Authority Officials During the On-Site Inspections

In case of an on-site competition law inspection concerning Arçelik, it is crucial to cooperate with competent Competition Authority officials. Severe administrative and legal sanctions may be imposed in cases where the on-site inspections are hindered or complicated. The following issues should, however, be considered in order to protect the rights of Arçelik during on-site inspections:

- Request to see the authorization documents of the officials who is in charge of the inspection and note their names, institutions and the time they came to the company.
- Immediately contact the Arçelik Legal and Compliance Director, as well as Koç Holding Legal and Compliance Department.
- Direct officials to Arçelik Legal and Compliance Director or a senior executive apointed by the Arçelik Legal and Compliance Director.

If Competition Authority officials request information or ask questions by ways of phone/e-mail etc., direct immediately their call to the Arçelik Legal and Compliance Director or an appointed senior executive.

4.7 Training and Monitoring

Each Arçelik company is required to abide the following provisions:

- Regularly provide the necessary trainings on competition law to all employees,
- Adapt this Policy, if necessary, according to the needs of the company and to prepare the necessary procedures.

Inform Arçelik Legal and Compliance Director if this Policy needs to be revised (due to local implementation decisions or regulations in the countries).

Arçelik Legal and Compliance Director:

- Reviews the content of the Company's own procedures and trainings, and monitors their completion status, in coordination with Koç Holding Legal and Compliance Department,
- Submits an annual training report to the Koç Holding Legal and Compliance Department.

5. AUTHORITY AND RESPONSABILITIES

All employees and directors of Arçelik are responsible for complying with this Policy, implementing and supporting the relevant Arçelik's procedures and controls in accordance with the requirements in this Policy. Each Arçelik company also expects and takes necessary steps to ensure that all its Business Partners to the extent applicable complies with and/or acts in line with this Policy.
If there is a discrepancy between the local regulations, applicable in the countries where Arçelik operates, and this Policy or Global Code of Conduct subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.
If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Arçelik Global Code of Conduct, you may report this incident to Arçelik Legal and Compliance Director Arçelik Legal and Compliance Director or via the below mentioned reporting channels:

web: www.ethicsline.net

Hotline Phone Numbers as listed in the web site:

https://www.arcelikglobal.com/en/company/about-us/global-code-of-conduct/

Arçelik employees may consult the Legal and Compliance Director for their questions related to 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. REVISION HISTORY

This Policy takes effect on 01.03.2021 as of the date approved by the Board of Directors and is maintained by Legal and Compliance Department.

Version Date: 15.06.2022

GLOBAL DONATION AND SPONSORSHIP POLICY

1. PURPOSE AND SCOPE

The purpose of this Donation and Sponsorship Policy (the "**Policy**") is to set standards, principles and rules to be complied with by Arçelik and its Group Companies, while making Donations and providing Sponsorships. In line with our strong belief that contributing to the community is the vital foundation for building successful business, Arçelik and its Group Companies see Donations and Sponsorships as a way to support the communities in jurisdictions where they operate.

All employees, directors, and officers of Arçelik and its Group Companies, as a Koç Group company, shall comply with this Policy, which is an integral part of Arçelik Global Code of Conduct. Arçelik and its Group Companies also expect and take necessary steps to ensure that all of its Business Partners - to the extent applicable - comply with and/or acts in line with it.

2. DEFINITIONS

"Business Partners" include suppliers, distributors, authorized service providers, representatives, independent contractors and consultants.

"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.

"Group Companies" means the entities of which the Company holds directly or indirectly more than 50% of share capital.

"Koç Group" means Koç Holding A.Ş. and 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.

"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.

3. GENERAL PRINCIPLES

While making Donations and providing Sponsorships, Arçelik and its Group Companies ensure that:

- They comply with its incorporation documents (including but not limited to its articles of association), and the restrictions and limits set forth by the General Assembly and/or the Board of Directors or similar body of Arçelik and its Group Companies;

- They comply with all applicable legislation in the jurisdictions where Arçelik and its Group Companies operate; including but not limited to relevant capital markets legislation, commercial code, and tax laws to the extent applicable;
- They do not conflict with the values or commercial interests of Arçelik and its Group Companies and comply with the principles in this Policy and Arçelik Global Code of Conduct.
- Donations and Sponsorships should be documented in accordance with the legislation.
- Donations and Sponsorships can be granted in cash or by products produced or owned by Arçelik and its Group Companies.

The Donation and/or the Sponsorship is

- properly documented and never in exchange for obtaining an improper advantage or benefit or used for the purpose of any form of corruption;
- not offered in connection with any bid, contract renewal or business opportunity;
- not made for political purposes to any politician, political party or political groups, a municipality or government official, either directly or indirectly via third party[9]
- not for the benefit to any entity or organization, which discriminates, based on ethnicity, nationality, gender, religion, race, sexual orientation, age or disability or
- not directly or indirectly used for human or animal rights' violations, promotion of tobacco, alcohol and illegal drugs and damaging the environment.

In addition to the above listed conditions, Arçelik A.Ş. -as a listed company in Turkey- shall also ensure that the upper limit for Donations is determined by the General Assembly and the Donations granted during the year shall be submitted to the General Assembly.

4. IMPLEMANTATION

If it is the first time that a Donation or Sponsorship transaction is made by Arçelik and its Group Companies in favor of any third party, the following steps should be completed before signing a contract and commitment by authorized persons according to the relevant company's signature circular and / or company's articles of association:

- If the transaction initiated by a department other than the department responsible for brand communication and Sponsorships, a written proposal containing a description of the planned use for the funds and information regarding the relevant entity (name, address, senior management) shall be submitted to the Global Communications Department for a corporate image and brand impact assessment via Sponsorship and Donation evaluation form. (If the relevant transaction is carried out by a department responsible for company brand communication and Sponsorships, it is excluded from this process. Example: Our company sponsors a football team with the Beko brand).
- Global Communications Department conducts preliminary examination and due diligence[10] about the party within this scope, and examines corporate history, information about stakeholders and negative news from public sources for preliminary examination;

[9] Please see Arçelik Global Code of Conduct and Global Anti-Bribery and Corruption Policy.

[10] Due diligence shall be conducted as per Arçelik Global Sanctions and Export Control Policy and Global Anti-Bribery and Corruption Policy. To the extent required, relevant documentation shall be shared with other departments (including legal, tax and capital markets compliance review).

- If the request and the result of the evaluation are evaluated positively, the process for Donations is followed in accordance with the approval table specified below.
- However, in the event of a Donation or Sponsorship transaction that may have a material impact over the Koç brand and Koç Group corporate image, in addition to the steps above, the request must be notified to the Koç Holding Corporate Brand Communications and Sponsorship Department by Arçelik Global Communications Department;
- For Sponsorships, the parties shall enter into a written agreement detailing all the conditions;
- For Sponsorships, sponsored entity, must provide the Global Communications Department post-event documentation (i.e. photos, videos or a report etc. as may be relevant) or any other documents or materials evidencing compliance with the Sponsorship agreement as soon as practically possible after the completion of the sponsored event or project. If, however, the sponsored event is a recurrent event, the Sponsorship agreement shall set forth the content and the frequency of reporting.);
- Supporting documents such as receipts and invoices must be kept by the accounting department and transactions must be booked in accordance with the relevant legislation;
- Due Diligence, approval, execution and follow-up processes shall be documented to be used for audit and compliance review where necessary;
- A report listing Donation and Sponsorship activities (including purpose, entity and due diligence results) shall be sent to Legal and Compliance Department in Koç Holding, on an annual basis, by the Global Communications Department of Arçelik.
- Arçelik and its Group Companies should follow the following approval stages according to the Donation amounts.

DONATION AMOUNT	APPROVAL PROCESS
Equivalent amounts below USD 5,000	**Turkey:** Approvals of the Director of the relevant business unit making the request and the CFO **Foreign Subsidiary:** Joint approvals of the Country Manager and the top manager of the finance and accounting unit of the relevant foreign subsidiary.
Exceeding the equivalent of USD 5,000 and more	**Turkey:** Approvals of the Director of the relevant business unit making the request, Legal and Compliance Director, CFO and the relevant Assistant General Manager. **Foreign Subsidiary:** Approvals of the Country Manager of the relevant subsidiary, the Regional Director (if any), the Management Team Member responsible for the relevant subsidiary and the CFO.

- Donations with a yearly total value of 1,000,000 TL or above or its equivalent in any other currency require a resolution of the Board of Directors. The tracking of reaching this amount is done by Arçelik Accounting Department.
- The CFO and the Management Team Member responsible for the relevant subsidiary must be informed when the annual Donation amount of foreign subsidiary exceeds USD 25,000 or equivalent. This notification is made by top managers of the finance and accounting unit of foreign subsidiaries and, in Turkey, this notification is made by Accounting Director.
- All Donations are reported to the Global Compliance Management under the Legal and Compliance Department. The top manager of the finance and accounting unit of each subsidiary informs the Global Compliance Management about the Donations of foreign subsidiaries.
- Legal and Compliance Department informs Arçelik Global Communications Department regarding the approved Donations.

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of Arçelik and its Group Companies are responsible for complying with this Policy. Arçelik and its Group Companies also expect and take necessary steps to ensure that all its Business Partners to the extent applicable complies with and/or acts in line with this Policy. Board of Directors and the country manager where the Donations and Sponsorship process take place remain liable from the risks created due to those processes.

This Policy has been prepared in accordance with the Koç Group Donation and Sponsorship Policy. If there is a discrepancy between the local regulations, applicable in the countries where Arçelik and its Group Companies operate, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Arçelik Global Code of Conduct, you should report this incident via the below mentioned reporting channels:

Web: www.ethicsline.net

Hotline Phone Numbers as listed in the web site:

https://www.arcelikglobal.com/en/company/about-us/global-code-of-conduct/

Legal and Compliance Department, is responsible for arranging, periodically reviewing and revising the Global Donation and Sponsorship Policy when necessary. Arçelik's and its Group Companies' employees may consult to the Arçelik Legal and Compliance Department regarding their questions about this Policy and its implementation. Violation of this Policy by an employee may result in significant disciplinary actions, including dismissal. If any third party that is expected to comply with this Policy acts in violation of this Policy, the relevant contracts may be terminated.

Version Date: 17.10.2022

GLOBAL ANTI-MONEY LAUNDERING POLICY

The aim of this policy is to set forth guidelines to prohibit and actively monitor the money laundering and the funding of terrorist or financial crimes that Arçelik and its subsidiaries ("Company") and its all third parties may face within the scope of their business activities. Within this concept, all operations of the Company are made in accordance with the key components of a program which includes; identification and verification of clients and third parties; monitoring of client activities; reporting and investigating unusual and suspicious activities; training staff in money laundering prevention and detection; and designating dedicated money laundering reporting officers.

This Policy has been prepared in accordance with Global Code of Conduct and the local laws and regulations, which are applicable in the countries that Arçelik operates to ensure the commitment to all relevant local and international laws and regulations (i.e Terrorist Financing Act, POCA (Proceeds of Crime Act), Money Laundering Acts). This Policy applies to all employees of Arçelik who are required to comply with all applicable anti-money laundering and terrorist financing laws and regulations in countries which Arçelik conducts business. Failure to do so may result in severe criminal, civil and regulatory penalties for Arçelik and its employees.

1. DEFINITIONS

Money laundering is the disguising or concealment of financial assets obtained via illegal means. It is an attempt to illegally legitimize criminal proceeds and disguise the true origin of assets, this is commonly achieved by placement, layering and integration. Money laundering may be committed through knowingly engaging in a financial transaction with the proceeds of a crime or negligent ignoring warning signs for unusual or suspicious activity in respect of a client or transaction.

Terrorist financing refers to activities that ensures financial support to of legitimate or illegitimate terrorists, individuals, groups, organizations or supporters of terrorism. Terrorism can be financed through illegal activity such as credit card fraud, illegal arms dealing and drug dealing, among other criminal activity. Terrorist financing may also involve the use of legitimately derived funds. In both instances the aim of terrorist financiers is to conceal the source and ultimate use of finances. As with money laundering, the appearance of being connected, directly or indirectly, to terrorism raises unacceptable levels of regulatory and reputational risk to Arçelik.

Politically Exposed Persons (PEPs) are individuals who are, or have been, entrusted with prominent public positions domestically or by a foreign country. For example, Heads of State or Heads of Government, senior politicians or government officials, judicial or military officials, senior executives of state owned corporations, prominent political party officials.

Sensitive Countries are the ones which have strategic Anti Money Laundering /Combatting Financing of Terrorism deficits that have not made adequate progress in addressing the deficits or have not stipulated to an action plan as per the Financial Action Task Force (FATF).

Sensitive Clients are the individuals or legal entities which have business relations with sensitive countries.

Facilitation payment is made to further "routine governmental action" that involves non-discretionary acts. Examples of "routine governmental action" include processing visas, providing police protection or mail service, and supplying utilities like phone service, power, and water. Routine government action does not include a decision to award new business or to continue business with a particular party. Nor does it include acts that are within an official's discretion or that would constitute misuse of an official's office. Thus, paying an official a small amount to have the power turned on at a factory might be a facilitating payment.

If you have any questions or further inquiries regarding the above, please consult to the Global Compliance Manager.

2. SUSPICIOUS ACTIVITIES

Arçelik employees should be vigilant of money laundering red flags and to report any suspicious activity to local compliance officers. By way of guidance, see below a non-exhaustive list of red flag scenarios.

- Suppliers, customers or third parties who do not provide complete information, false or suspicious information, or is anxious to adhere to reporting or recordkeeping requirements,
- Customers who willfully agree to pay above the market conditions,
- Customers or suppliers who request the payments to be conducted in cash or cash equivalents,
- Transactions relating to high-risk countries, as defined by the FATF,
- Abnormal cash transfers, incompliant with the business rationale of the related transaction,
- Multiple money orders, traveler's checks, or large amounts of cash,
- Payments made in currencies other than those specified in the agreements,
- Payments requested to or by third parties, who are not named in the corresponding contracts,
- Unusual receipt of transactions from a certain person or entity, where the origin of the funds is not known,
- Payments to persons or entities who reside in countries known as "tax heavens" or into "shell bank" accounts, or unusual fund transfers to or from foreign countries unrelated to the transaction,
- Payments to or from entities in which, it is not possible to identify the shareholding structure or ultimate beneficiaries.

When you are in doubt, please ask help from Global Legal and Compliance Department for guidance.

3. KNOW YOUR CLIENT ("KYC")

Arçelik and its employees are required to exercise a level of care and due diligence when dealing with clients to avoid being willfully blind to money laundering or other suspicious activity. Consistent with this, Arçelik and its employees must adhere to the following principles:

- Sufficient information about the business environment and the purpose of the intended business of the third parties must be procured,
- Money laundering risks related with third parties must be assessed for aims of monitoring the third parties' activities,
- The integrity of potential customers and other business relationships must be assessed,
- The owner, business manager and key principals must be checked against watch lists and reputational intelligence through local investigators,
- Media research in English and also the local language about the owner, business manager and its key principals must be conducted,
- The ongoing monitoring based on the risk profiles of customers, suppliers and distributors must be performed,
- Arçelik's compliance expectations must be communicated to the stakeholders at all times,

In case there are reasons to be suspicious on the business partners because of wrongdoings pertaining to dealings, interactions, transactions with Arçelik, those suspicions must be reported to the Global Compliance Manager, immediately, for further investigations.

4. ROLES AND RESPONSIBILITIES

All employees must follow the requirements set forth in this Policy. This Policy is published by Finance Department and it takes any corrective and/or preventative actions to be taken against any non-compliant behavior including termination of employment. Compliance Officers are employees of the Company appointed by the Chief Legal and Compliance Officer of Arçelik as being responsible for monitoring the Company's operations pertaining to this Policy.

This Policy will be periodically reviewed by the Arçelik Legal and Compliance Department to ensure compliance with new or revised laws and regulations.

Version Date: 2.12.2019

GLOBAL PERSONAL DATA PRIVACY POLICY

1. PURPOSE AND SCOPE

Arçelik and its affiliates and subsidiaries (together “Company”, “we”, “us”) is committed to protecting the privacy and the personal data of everyone we do business with, including our customers, suppliers, employees and contractors. In recognition thereof, Company has adopted this Personal Data Privacy Policy (the “Policy”). This Policy aims to determine the framework and coordinate the compliance activities to be carried out specifically for Arçelik in order to comply with the Applicable Data Protection Laws on the protection and processing of personal data.

One of the most important issues for the Company is to comply with the general principles stipulated in the Applicable Data Protection Laws in the processing of Personal Data. In this context, our Company acts in accordance with the principles listed below in the processing of Personal Data in accordance with the Applicable Data Protection Laws.

- engaging in Personal Data processing activities in compliance with the law and the rule of integrity,
- ensuring Personal Data are accurate and up-to-date when necessary,
- processing for specific, explicit and legitimate purposes,
- being related to the purpose for which they are processed, limited and measured,
- retention for as long as required for the purpose of processing or envisioned in the Applicable Data Protection Laws.

2. DEFINED TERMS

Anonymization means making Personal Data incapable of being associated with an identified or identifiable natural person under any circumstances, even by matching with other data.

Applicable Data Protection Laws, all relevant privacy, data protection or related laws and regulations in Turkey (Law on the Protection of Personal Data) in the European Economic Area (EEA), in the UK and in Switzerland that apply to the Processing of Personal Data, including but not limited to the EU General Data Protection Regulation 2016/679.

Arçelik, represents all companies directly or indirectly, individually or jointly controlled by Arçelik A.Ş. and Arçelik A.Ş.'s joint ventures included in the consolidated financial report.

Business Partners means suppliers, dealers, authorized service companies, all kinds of representatives, subcontractors and consultants acting on behalf of the Company.

Data Controller refers to the natural or legal person who determines the purposes and means of processing Personal Data and is responsible for the establishment and management of the data recording system.

Explicit Consent refers to the consent that is based on information and freely expressed regarding a specific subject.

Global Data Protection Officer: The Company official responsible for ensuring compliance with Applicable Data Protection Laws, identifying and preventing risks, preventing all kinds of violations and managing processes. Global Data Protection Officer can be assigned by the Arçelik A.Ş.'s Legal and Compliance Director.

Koç Group, represents all companies directly or indirectly, individually or jointly controlled by Koç Holding A.Ş.

Local Data Protection Officer: In case his employment is legally required by the Applicable Data Protection legislation; It is the Company officials who report to the Global Data Protection Officer and manage the processes locally in order to ensure compliance with these regulations, identify and prevent risks, and prevent all kinds of violations. Local Data Protection Officer can be assigned and dismissed by the Legal and Compliance Director.

Personal Data, any data relating to an identified or directly or indirectly identifiable natural person ("Data Subject"); identification can occur by reference to an identifier such as a name, identification number, location data, an online identifier, or to one or more factors specific to an Individual's physical, physiological, genetic, mental, economic, cultural or social identity.

Personnel means all permanent employees, officials, subcontracted workers, full or part-time employees, relevant third-party consultants and temporary employees acting on behalf of Arçelik organizations and subject to this Policy.

Process or Processing, any operation or set of operations performed upon Personal Data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, dissemination or otherwise making available, international transfer, alignment or combination, blocking, erasure or destruction.

Processor refers to the natural or legal person who processes personal data on behalf of the Data Controller, based on the authority given by the Data Controller.

Related Person, the natural person whose personal data is processed (customers, visitors, employees and employee candidates, etc.).

Data Security Measures refers to measures aimed at preventing, mitigating or compensating Privacy Violations, including legal, organizational or technical measures targeting the integrity, availability and confidentiality of Personal Data.

Personal Data Breach refers to the unintentional or unlawful destruction, loss, alteration, unauthorized disclosure or access to Personal Data.

Special Categories of Personal Data or Sensitive Personal Data, any Personal Data relating to an Individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic characteristics, biometrics, health, sex life, sexual orientation, or criminal convictions.

The Data Controllers Registry (VERBIS) is a registration system in which data controllers have to register and declare information about their data processing activities.

3. RESPONSIBILITIES

- Company employees and managers are obliged to comply with this Policy. The Company expects its Business Partners to comply with this Policy to the extent applicable to the relevant party and transaction and takes the necessary steps for this.

- Senior management within Company is responsible for enforcing compliance with this Policy, including the maintenance of an appropriate governance structure and the allocation of resources necessary to ensure compliance and enforcement.

- Personnel shall promptly notify the Global Data Protection Officer if they suspect or are aware that this Policy conflicts with any local legal or regulatory obligation or that a particular Company practice violates this Policy.

- Company may implement additional policies, procedures or practices as may be necessary to ensure compliance with this Policy or meet local Applicable Data Protection Laws.

4. IMPLEMENTATION OF THE POLICY

a. General Terms

Company strives to Process Personal Data in a manner consistent with this Policy and with Applicable Data Protection Laws. Where Applicable Data Protection Laws impose a higher level of protection than this Policy, Company must comply with such laws or regulations.

b. Basic Principles

i. Lawfulness and Purpose Limitation

Company shall only Process Personal Data lawfully, fairly and for specified, explicit and legitimate business purposes and with an appropriate justification (legal basis) under Applicable Data Protection Laws. This justification can be consent of the Data Subjects, the performance of an agreement or taking steps prior to entering into an agreement, a legal obligation, or a legitimate interest of Company that is not outweighed by the interests or fundamental rights and freedoms of the Data Subjects. Where Company is required by applicable law or by internal policies to request and obtain the consent of the Data Subjects prior to the Processing of certain Personal Data then Company shall seek such consent and honor it. Company shall keep a record of consents that it obtains and put in place effective means for Data Subjects to withdraw their consent.

ii. Data Minimization

Company shall limit its Processing of Personal Data to the minimum amount of information necessary to pursue the established purpose or purposes. Where possible, Company shall rely on information that does not identify Data Subjects.

Company shall minimize the extent of its Processing, access to and retention of Personal Data to what is necessary for the established purpose or purposes. Access shall be limited to a need-to-know basis. Save exceptions, Personal Data shall not be made accessible to an indefinite number of individuals.

iii. Maintaining Integrity and Quality

Company shall at all times maintain the integrity of the Personal Data IT Processes and take reasonable steps to keep Personal Data accurate, complete, up-to-date and reliable for its intended use.

iv. Retaining and Deleting Personal Data

Company shall not retain Personal Data for longer than necessary. Personal Data must be destroyed by deletion, destruction, or anonymization in accordance with applicable Company Policies and record retention schedules, including the Company's Global Personal Data Protection and Record Retention Policy.. These Company policies and record retention schedules take into account Company's business needs, its legal obligations, and scientific, statistical or historical research considerations.

c.Transparency

i. Company shall provide clear information to Data Subjects about, at a minimum:

- the identity and the contact details of Company acting as the controller.of the Personal Data and of its Global Data Protection Officer, if such exists, or of its Data Protection Officers at local level;
- the categories of Personal Data relating to Data Subjects that Company Processes;
- the purposes for which the Personal Data is Processed, and the Company's justifications for such Processing;
- disclosures of the Personal Data to third-party recipients;
- the rights of Data Subjects in respect of their the Personal Data, including their right to lodge a complaint with a supervisory authority;
- transfers of Personal Data outside Turkey, the EEA, the UK and Switzerland and the legal safeguards applying to such transferred Personal Data;
- the retention period or the criterion used to determine the retention period of the Personal Data;
- whether the provision of the Personal Data is mandatory and the possible consequences if the Individual fails to provide the Personal Data; and
- the existence of automated decision-making which produces legal or similar effects and information about the logic involved, where relevant.

ii. Data Subjects shall be provided with any additional information required by local Applicable Data Protection Laws.

iii. Save limited exceptions, the information set out above shall be provided to the Data Subjects at the time their Personal Data is obtained.

iv. All communications to Data Subjects about the Processing of their Personal Data shall be approved by the local Data Protection Officer and, where necessary, by the Global Data Protection Officer based on Company's templates.

v. Applicable Data Protection Laws may provide for derogations to the transparency requirement in exceptional cases, for example, where providing such information imposes a disproportionate burden. Such derogations shall not be relied upon without prior consultation of the Global Data Protection Officer.

d. Rights of Data Subjects

i. Company should consider the Personal Data requests of the Related persons regarding access rights, restrictions, data portability, deletion, opposition or withdrawal of consent based on the rights envisaged in the Applicable Data Protection Laws. .Such requests shall be free of charge.

ii. Company must respond to these requests as soon as possible and ensure that the request is met, Unless a shorter period of time is stipulated by the Applicable Data Protection Laws at the latest within one month.

iii. Company is not obliged to meet a request when it cannot lawfully relate Personal Data to the Individual making the request or when a request is manifestly unfounded because of its repetitive nature.

iv. While the relevant application is being finalized, information should be given in a language and format that the person can understand. In the event that the application of the person concerned is rejected, the response is insufficient, or the application is not answered in due time, necessary warnings should be made within the Company and awareness should be raised about the right to complain to the relevant authority.

v. During the acquisition of Personal Data, the persons concerned should be informed in accordance with the Applicable Data Protection Laws. In this context, Personal Data collection channels should be determined by the Company in order to fulfill its obligation of disclosure; Regarding these collection activities, the related persons should be informed about the clarification texts that have the scope and conditions sought in the Applicable Data Protection Laws and appropriate processes should be designed accordingly.

vi. Personal Data collection channels should be kept up-to-date by Arçelik in a list and shared with the company's department or officer responsible for compliance and Koç Holding Legal and Compliance Consultancy at 6-monthly periods (June-December) twice a year.

e. Processing Personal Data

i. As a rule, Personal Data should be processed in accordance with at least one of the conditions specified in the Applicable Data Protection Laws. It should be determined whether the Personal Data processing activities carried out by the Company business units are carried out based on at least one of these conditions, and Personal Data processing activities that do not meet this requirement should not be included in the processes.

ii. Personal Data must be processed for legitimate and lawful reasons. Arçelik should process Personal Data in connection with its activities and process it whenever it is legally necessary.

iii. Personal Data should only be retained for the period stipulated in the Applicable Data Protection Laws or required by the Personal Data processing purpose. In this context, first of all, it should be determined whether a certain period is foreseen for the storage of Personal Data in the Applicable Data Protection Laws, if any period is determined, this period should be acted upon, and if the period is not determined, Personal Data should be kept for the period necessary for the realization of the purpose of processing. Personal Data should be deleted, destroyed or anonymized in the event that the period expires or the reasons for its processing disappear. Personal Data should not be stored for future use.

iv. As a rule, Special Categories of Personal Data should be processed in accordance with the conditions determined in the Applicable Data Protection Laws. It should be ensured that the Special Categories of Personal Data processing activities carried out by the business units of the Company are acted in accordance with these conditions, the administrative and technical measures to be taken regarding the processing of Special Categories of Personal Data and the existence of the following conditions should be ensured:

(i) Special Categories of Personal Data other than health and sexual life may be processed without the Explicit Consent of the person concerned, provided that it is expressly stipulated in the law, in other words, there is a clear provision in the relevant law regarding the processing of Personal Data. Otherwise, the Explicit Consent of the person concerned should be obtained.

(ii) Special Categories of Personal Data regarding health and sexual life can be processed for the purpose of protection of public health, preventive medicine, medical diagnosis, treatment and care services, planning and management of health services and financing, without seeking the Explicit Consent of persons under the obligation of keeping confidentiality or authorized institutions and organizations. Otherwise, the Explicit Consent of the person concerned should be obtained.

Processing activities on Special Categories of Personal Data should be carried out, taking into account the regulations stipulated in the Applicable Data Protection Laws regarding the processing of sensitive Personal Data and their transfer to third parties at home and abroad; In addition to the above-mentioned issues, Personal Data processing activities should be carried out by fulfilling the special requirements of the Applicable Data Protection Laws in these cases.

f. Maintaining Appropriate Security and Reporting Personal Data Breaches

i. Company should apply Data Security Measures to ensure the security of data, especially in all transactions concerning the transfer of Personal Data.These Data Security Measures shall take into account the risks represented by the Processing, the nature of the Personal Data concerned, the state of the art and cost of the implementation of the Data Security Measures.

ii. The Data Security Measures shall be set out in written security policies and procedures.

iii. Personnel must immediately report the Personal Data Breach to Arçelik A.Ş.'s Global Data Protection Officer and Information Security and Telecommunication Departments and keep a record of the Security violations in accordance with the Company's Data Breach Protocol..

iv. With the awareness of the importance of ensuring data security in all aspects within the Company, appropriate and necessary technical and administrative measures should be taken to prevent the unlawful processing or access of the processed Personal Data and to ensure that the data is kept in accordance with the law. In this context, the necessary audits should be carried out by the Company and/or should be done by a third party. Employees should be given training on the Applicable Data Protection Laws within the scope of the measures by the Company. Arçelik should inform the Company's Local Data Protection Officer or Global Data Protection Officer and Koç Holding Legal and Compliance Consultancy should be informed about the trainings held within this scope.

g. Disclosure of Personal Data

i. Company shall only disclose Personal Data only when required by law and as long as it is not contrary to the Applicable Data Protection Laws.

ii. For the sake of privacy and security of Personal Data, the Company should carefully select the Data Processors working with, subject them to contractually committed controls and ensure that Data Processors comply with the Applicable Data Protection Laws.

h. International Transfers of Personal Data

i. Company shall only transfer Personal Data only in accordance with the terms in the Applicable Data Protection Laws.

ii. Save limited exceptions under the Applicable Data Protection Laws, Company shall put in place appropriate safeguards, such as transfer agreements to overcome restrictions on international transfers of Personal Data under the Applicable Data Protection Laws.

iii. Exceptions under the Applicable Data Protection Laws regarding restrictions on International Transfers may only be processed after review and approval by the Company's Global Data Protection Officer.

i. Training

Employees Processing Personal Data as part of their role or function shall be regularly trained on compliance with this Policy. Training should be adapted to the role or function of the Personnel concerned. Arçelik should inform the Company's Local Data Protection Officer or Global Data Protection Officer and Koç Holding Legal and Compliance Consultancy regarding the trainings held within this scope.

j. Monitoring and Records

i. The Global Data Protection Officer and the local Data Protection Officers shall conduct periodic reviews and audits to ensure compliance with this Policy.

ii. In the event that the processed Personal Data is obtained by others illegally, this should be reported to the related person as soon as possible and to the relevant authorities in accordance with the Applicable Data Protection Laws. In this context, the necessary infrastructure should be established by the Company, which will include the Local Data Protection Officer and the Global Data Protection Officer. In addition, in such cases, Koç Holding Legal and Compliance Consultancy should be informed immediately.

iii. Company shall maintain a record of Processing operations. The record must be made available to supervisory authorities upon request.

iv. Arçelik companies located in Turkey, which are obliged to register with VERBIS according to the criteria determined in the Turkish Legislation, must register with VERBIS as a Data Controller. In case of a change in the registered information, the information must be updated in VERBIS within seven days from the date of the change. The updates made in VERBIS by Arçelik companies residing in Turkey should be reported to Koç Holding Legal and Compliance Consultancy by the Global Data Protection Officer at 6-monthly periods (June-December) twice a year.

k. Compliance and Waivers

i. Requirements imposed by this Policy may be waived only on a case-by-case basis in exceptional circumstances and subject to conditions, following approval from the Global Data Protection Officer.

ii. Any member of Personnel not compliant with this Policy may be subject to disciplinary measures, including termination of employment.

iii. Violation of this Policy may result in serious consequences for the Company's relevant managers and employees, including legal, administrative and criminal sanctions depending on the Applicable Data Protection Laws in the region of operation, and most importantly, the reputation of the Company and Koç Group. In case of violation of this Policy by third parties, the legal relationship between the said parties and Koç Group may be terminated immediately.

5. MORE INFORMATION

Arçelik Legal and Compliance Directorate is the unit responsible for the implementation of this Policy.

Company shall circulate this Policy to the Personnel and may translate the Policy into local languages for information purposes. In case of discrepancies between local language and the English version, the English version of the Policy shall prevail.

Questions or concerns regarding this Policy or privacy matters more generally must be directed to the Global Data Protection Officers Office (contactable via phone on +90 212 314 34 34 or e-mail at compliance@arcelik.com). As an alternative method, you can make all your notifications about ethical violations via the link “www.ethicsline.net”.

Version Date: 15.06.2022

GLOBAL PROTECTING AND RETAINING INFORMATION POLICY

1. RECORD TYPES

The Policy applies to the information contains in the following records:

- Paper,
- Electronic files including but not limited to databases, word documents, PowerPoint presentations, spreadsheets, webpages, and e-mails,
- Photographs, scanned images, CD-ROMs and memory sticks.

The Policy aims to cover all types of records created by the company, such as;

- All corporate governance documents such as board and board committee materials, meeting minutes,
- All documents and information to be kept within the legal hold period within the scope of the local laws and regulations, which are applicable in the countries that Arçelik operates,
- Contracts,
- All documents related to research and development /intellectual property and trade secrets,
- Technology software licenses and related agreements,
- Marketing and sales documents,
- Invoices,
- All employee records,
- E-mails.

2. RECORD CLASSIFICATION

Existing business process is necessary to establish the record's value. During this process, all record categories need to be reviewed and evaluated according to its;

- Legal value
- Operational value
- Historical value

Accordingly, records and documents are classified as "public, personal and confidential". The Company's retention schedule is developed and constituted with respect to the records classification by fulfilling legal, administrative, financial and/or historical obligations.

3. CLASSIFICATION LEVELS

a. Public: the document/record which made publicly available by the authorized corporate communications departments. Such information contains public information that can be revealed without affecting Arçelik. It is not incompliance with persons' privacy or knowledge of this information does not subject Arçelik or its affiliates to any kind of financial or reputation loss or does not threaten the security of Arçelik assets.
b. Personal: the document/record is made up of individuals' own (for personal usage not business related) data and/or information including personal e-mails, tables and any other documents belong to individuals.
c. Confidential: All kinds of information, which are not publicly available or are not made publicly available by Arçelik are considered confidential including, but not limited to technical, operational, financial information.

Confidential Information covers all types of information pertaining to the customer or vendor records, actual and former employees, third parties that the Company has business interaction and national security information retained due to the employees' positions.

4. GENERAL PRINCIPLES REGARDING CONFIDENTIAL INFORMATION

Within the concept of its business activities and relationship with third parties, Arçelik may process Confidential Information for the following reasons:

- Regulatory reasons to act in compliance with the obligations,
- Technical reasons to develop and maintain the product quality,
- Contractual reasons to perform or manage business operations or to establish, exercise or defend legal claims,
- Client or vendor interaction pertaining to Arçelik's business operations to respond or make inquiries,
- Transactional reasons such as shipments, deliveries, transportation and support services,
- Financial matters, including but not limited to payment processing, accounting, auditing, monitoring, billing and collecting processes,
- Customer, vendor or third-party due diligence reasons, covering the corporate intelligence, market researches, product benchmarking and questionnaires,
- Security considerations to protect and maintain Arçelik products, services, websites and working locations.

Arçelik employees acknowledge that violating the confidentiality, during and after the employment and disclosing the confidential information without authorization to third parties, can result in serious competitive disadvantage to the company whereas causing immeasurable financial, legal and other types of damages to the Company. The obligation not to circulate or disclose confidential information is applied even though the related information might not be specifically identified or marked as confidential.

Regarding Arçelik's obligations pertaining to the Confidential Information, the following criteria must be taken into consideration at minimum:

- Confidential information cannot be used to knowingly convert a company business opportunity for personal use,
- It is not accepted to trade in the Company's stocks, or the stocks of any other company, based on the confidential information,
- Divulging confidential information to third parties so that they might trade in stocks, is prohibited,
- Seeking out, accepting or using of a confidential information of or from a competitor of Arçelik is illegal.

The circulation and transferring the confidential data is done under the following criteria:

- Regarding Arçelik's aim to be compliant to all rules and regulations of the countries that it has operations, the confidential information can be transferred to law enforcement authorities or regulators, with taking the legal authorizations at all times,
- The confidential information can be shared with Arçelik's contracted service providers where the confidentiality is protected with contract terms or non-disclosure agreements, which only act upon the instructions of Arçelik.

5. MINIMUM RETENTION PERIOD

Using the records value criteria, the Company develops a recommended retention period and schedule procedure for each category of records and documents by comprehensively, fulfilling administrative, financial and/or historical obligations. The recommended minimum retention schedule is determined for each records and documents category by the Company where local and international laws and regulations are identified.

Arçelik retains records and documents regarding the Company's retention schedule and procedure. Unless any specific law and regulation provides for a longer or shorter retention period than the Arçelik's retention schedule, the Company shall follow the instructions of Arçelik retention schedule.

As long as a record and/or a document has not been specified as permanently preserved, the retention period is identified in accordance with the retention schedule. For "permanent preservations" monitoring is defined and scheduled within the retention period procedure.

6. DISPOSITION

Each department is responsible from ensuring the retention schedule.

When the retention period is expired, the record and/or document are reviewed by the relevant Director (or their delegate) in consultation with relevant stakeholders such as, Head of IT, Head of Legal and Compliance and/or other senior managers and a 'disposition action' is agreed upon.

A **"disposition action"** is either:

- The further retention of the record or document within Arçelik
- The destruction of the record or document.

The record and document reviewing should be performed as soon as possible after the expiration of the retention period. The disposition decision is reached having regard to:

- Continuous business accountability needs (including audit)
- Current legislation

If the record and document has any long-term historical or research value:

- costs related to sustained storage versus costs of destruction need to be reviewed
- the legal, political and reputational risks associated with keeping, destroying or losing control over the record/documents need to be reviewed.

Disposition records must be kept by the disposing department for future audit purposes.

a. Further Retention of Records and Documents

Irrespective of the Company's Record Retention Policy, if the record and/or document is necessary by any part of the business, and upon receiving notice of a lawsuit, government investigation or other legal action against Arçelik, records and documents are preserved and safeguarded. Otherwise, the Company applies the following disposition actions.

b. Destruction of Paper/Electronic Records and Documents

Destruction should be conducted in a way that keeps the confidentiality of the records/ documents and that correspond with non-disclosure agreements. All copies including backup or preservation copies should be erased at the same time in the same direction.

The Record Retention Policy requires soft copies of paper/electronic records to be erased complying with the IT procedure. Giving the fact that deletion of the soft copy files is not considered to be a sufficient method, this procedure should be complying with IT procedures.

Destruction of any record which are classified as confidential level shall be complied with the local laws and regulations, which are applicable in the countries that Arçelik operates.

7. AUTHORITY AND RESPONSIBILITIES

This Policy is published by Arçelik Legal and Compliance Department, and the Company is responsible for ensuring the compliance with the Policy by all its employees. Any violation of this Policy will result in disciplinary action, up to and including termination of employment.

This Policy will be periodically reviewed by the assigned Legal and Compliance Department to ensure compliance with new or revised laws and regulations.

Version Date: 2.12.2019

GLOBAL RESPONSIBLE PURCHASING POLICY

1. INTRODUCTION

In line with its vision “Respecting the World, Respected Worldwide”, Arçelik aims to ensure the satisfaction of its customers, to provide product and services at universal quality and standards by using limited natural resources efficiently, and to contribute to economic social development. By this means, it aims to be symbol of trust, continuity and respect for its customers, shareholders, employees, suppliers, dealers and authorized services - in short, all stakeholders - nationally and globally.

Arçelik is part of the Koç Group, which has signed the United Nations Global Compact. This convention consists of 10 principles determined on human rights, labour, environment and anti-corruption matters. Arçelik is also among the first companies signing the Code of Conduct published by the Home Appliance Europe (APPLiA).

With this Policy, Arçelik commits that its suppliers act in accordance with International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, United Nations Universal Declaration of Human Rights, United Nations Global Compact and United Nations Guiding Principles on Business and Human Rights.

In line with its strong values, transparent policies and standards, Arçelik always expects from its employees and business partners to act in accordance with high ethical values and compliant with all relevant laws and regulations in the countries they operate. This Policy sets out the ethical and legal standards which all Arçelik suppliers[1] must comply with in all business practices.

It is a contractual obligation for the suppliers to accept and comply with this Policy within the scope of the “Environment and Business Ethics” article of the Arçelik A.Ş. Purchase Contract, which is signed between Arçelik A.Ş. and its suppliers. In case of violation of this Policy, Arçelik A.Ş. reserves the right to terminate the purchase contract.

2. PURPOSE, SCOPE AND BASES

This Policy is designed to ensure that suppliers’ business practices are aligned with Arçelik values, applicable laws and regulations and must be complied with by all suppliers. Likewise, Arçelik expects from its suppliers to have and implement "Responsible Purchasing Policy" covering its own supliers (Arçelik's Tier 2 suppliers).

Candidates who want to be the supplier of Arçelik are subject to the “Supplier Commissioning/Evaluation” process. Under this process, suppliers are evaluated in a manner to cover many steps, including Arçelik Responsible Purchasing Policy perspective. If Arçelik deems it necessary, it has the right to audit its supplier on-site or have it audited by independent auditing companies within the scope of this Policy. The program of this Policy has three operational pillars:

- **Prevention** - supplier works to embed a culture of integrity at all levels, in all countries where it has operations.

- **Detection** - Supplier employees are encouraged to speak up and give voice to Arçelik values

[11] Arçelik suppliers will be referred to as supplier.

• **Response** - Arçelik has the necessary infrastructure to duly investigate violations. if necessary, Arçelik sanctions confirmed breaches with a standard and uniform approach, and uses what is learnt to continually improve.

Arçelik conducts all operations with honesty, and with respect for human rights and by protecting the interests of its employees and expects from its all suppliers to adopt these rules and act in accordance with these rules.

This Policy, in addition to establishing a standard of conduct, includes rules on fighting against corruption, ensures that suppliers' employees work in esteemed working environments, sets forth standards for the protection of information and data, and guides Arçelik suppliers for the behaviour model it expects from them to be adopted in their external relations.

Arçelik Responsible Purchasing Policy may not respond to every specific question and problem. If specific situations are not expressly covered, the purpose of this Policy must be upheld by exercising common sense and good judgement in light of the objective criteria.

3. SUPPLIERS - BUSINESS PRACTICE

3.1 Compliance with the Law

The Supplier, must comply with the relevant laws and regulations (processing and protection of personal data, fighting against corruption, competition, environment, occupational health and safety, intellectual property rights etc.) and with the scope of the contract arrangements established under the scope of current contractual relationship.

Suppliers must act in compliance with the applicable labor law of the countries they operate regarding working hours and rights of annual leave. Wages paid to supplier employees, overtime and wage-based rights must comply with the applicable labor laws of the countries in which they operate.

3.2 Employees

Suppliers respect and accept ethnic and cultural diversities and take measures to protect and promote diversities and commit to create working environments where there is equal opportunity, mutual trust, respect for human rights without discrimination.

Suppliers recruit their employees only based on their qualifications and abilities and put necessary effort for their development. Any form of forced, compulsory, trafficked or child labour incompliant with relevant legislation at suppliers are never tolerated. Suppliers take necessary measures for the health, safety and security of their employees. Zero tolerance is shown towards the violation of supplier employees' privacy in any form of physical, sexual, psychological and/or emotional harassment in the workplace or anywhere they present due to work.

Suppliers respect their employees' right to unionization and their decision to become a union member, their right to organize and collective bargaining in accordance with the law.

3.3 Human Rights

Suppliers protect and respect the human rights, human dignity and privacy of the communities they influence through their business activities.

Suppliers also ensure that they will carry out their all commercial activities without resorting to violence or abuse, that they will refrain from, and will not allow, being involved in any crime in relation to human rights violations.

Suppliers are expected to act in accordance with the United Nations Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and requirements of the international conventions of the country in which they operate.

3.4 Occupational Health and Safety

The expectations of Arçelik regarding Occupational Health and Safety (OHS) from its suppliers are as follows;

• To comply with legal arrangements and requirements determined by Arçelik,

• To determine the organization, roles and responsibilities and share them with their employees,

• To make, or to make sure risk assessments are made by OHS expert, and to prevent possible work-related accidents and occupational diseases by taking necessary precautions,

• To ensure making control, measurement, examination and research for identification of risks,

• To provide resources, tools and equipment for the works, and to have periodic maintenance and control,

• To establish safe and healthy workplace for employees, trainees, visitors and special risk groups, and to ensure that they are kept under health surveillance,

• To have the necessary measurements, tests and analyses done in the workplace,

• To increase OHS awareness of the employees by training and informing practices in accordance with the legislation,

• To take opinions and suggestions of the employees and support their participation,

• To continuously carry out studies for preparation of emergency situations and response actions,

• To monitor and audit whether OHS measures are followed or not, and to ensure that nonconformities are eliminated.

3.5 Conflict Minerals

Establishing mutually beneficial relationships with all business partners is the principle of Arçelik. Arçelik expects from all business partners to act in line with its own values in business dealings and accordingly also expects from its suppliers to adopt appropriate professional understanding with their business partners. In line with the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”, suppliers providing Arçelik with components that contain tin, tantalum, tungsten, and gold metals, which are considered as conflict minerals:

• Must ensure that they procure only from conflict-free sources.

• Must communicate this requirement to the supply chain to ensure proper supply,

• Must comply with the Arçelik Conflict Minerals Policy.

3.6 Environmental Regulations and Protection

Arçelik is aware of its social responsibility to protect the environment and expects from its suppliers to undertake to establish environmental management systems, to improve it continuously and to protect the environment in accordance with the relevant national and international legal legislations and regulations in order to enhance their environmental performance in line with the principles of sustainable development and circular economy. While Arçelik operates in line with the principles of prioritizing the sustainability approach and fighting the climate crisis, it expects from its suppliers to take the Arçelik Environmental Policy as a reference and become a partner in this commitment.

As part of this commitment, all Arçelik suppliers, without limitation, must:

• Ensure in their all activities that compatibility requirements of environmental legal legislations are met,

• Keep all environmental permits, licenses and all documents up-to-date and follow their compliance with legal arrangements,

• Adhere to all applicable laws, regulations, customer requirements and Arçelik procedures regarding the prohibition or restriction of hazardous chemicals that can be used in materials, parts, components of products,

• Ensure that its wastes are collected separately by separate classification according to their types at source, and recycled in accordance with the relevant legal arrangements,

• Address the environmental risks and opportunities by integrating environmental management into the business processes and strategies, and take actions to minimize the environmental risks,

• Set targets and objectives to improve environmental performance, plan the actions, follow the results, and focus on continuous improvement for their products, their production activities and their suppliers,

• Consider the principles of transition to a low-carbon economy in their investments and machine-equipment choices,

• Carry out activities to combat the climate crisis and contribute to transition to a low carbon economy, considering the climate related risks and opportunities of their activities,

• Ensure that environmental aspects and impacts are prevented at source in their all processes throughout the life cycle,

• Design and manufacture environmentally friendly products,

• Focus on reducing energy consumption, water consumption, resource consumption, and chemical consumption by using the best available techniques and cleaner production technologies and using natural resources efficiently,

• Aim to increase energy efficiency studies as well as use of renewable energy resources,

• Determine the water risks considering the sector needs and the geographies in which is operated, and conduct studies to manage these risks,

• Manage their processes in line with the circular economy approach,

• Control air emissions to prevent air pollution,

• Reduce and/or eliminate waste and wastewater generation, greenhouse gas emissions, chemical use and all other environmental impacts by reuse, recycling, mitigation or substitution processes in the product, production, transportation, storage and all other operations,

• Focus on protecting ecosystems, habitats, all species especially endangered species and endemic species, preventing land degradation, maintaining, continuously improving and developing the capacity of natural ecosystems and aim to manage impacts on biodiversity in a sustainable manner,

• Be in compliance with environmental conditions in the "Arçelik Chemical Compliance Specifications", which is prepared by Arçelik, published at: "https://supplier.arcelik.com/en/enviroment" and updated periodically,

• Send environmental compliance information, document and reports to Arçelik in accordance with this specification.

3.7 Competition Law

We, as Arçelik, encourage fair competition and support the development of competition law while carrying our activities. In this context, all of our suppliers must act in accordance with the competition law. Otherwise, a violation of Competition Law may result in extremely severe sanctions being imposed against both companies and employees. While Arçelik suppliers strongly protect their own legal interests, they act in full cooperation with the competition authorities.

3.8 Fighting Against Bribery and Corruption

Suppliers do not engage in any inappropriate conduct, such as receiving or giving bribes or other improper advantages for business and financial gain. No supplier employee may offer, give or receive a gift or payment that may possibly be perceived as a bribe. Corruption, embezzlement, any kind of facilitation payments or bribery, regardless of their type or manner of occurrence, have no place in business practices of Arçelik suppliers. All accounting records and supporting documents of the suppliers must accurately and clearly describe and reflect the nature of underlying transactions. There should be no undisclosed, or unrecorded accounts, fund or assets established or maintained in the financial systems of the suppliers.

3.9 Management of Conflicts of Interest

Supplier employees must avoid situations where their personal interest conflict with the interests of the suppliers for which they work. Suppliers and their employees take necessary measures to ensure that their relationships with Arçelik do not conflict with their personal interests and the responsibilities of the supplier to Arçelik within the rules specifies by Arçelik.

3.10 Gifts and Entertainment

Under certain circumstances exchanging gifts and hospitality are acceptable to increase the strength or maintain business relationships among business associates. Suppliers must not receive or give any gifts that would constitute incompatibility with the law other than commercial tradition and promotional materials and must avoid hospitality activities that go beyond its purpose.

3.11 Trade Restrictions

Some countries where our suppliers operate may have restrictions on some other countries, companies or people. Suppliers follow laws on trade restrictions, export controls, embargo, boycott, anti-corruption and customs laws regarding their activities when necessary, and commits to act in compliance with such laws and regulations. Suppliers are aware that if these restrictions are violated, extremely serious consequences may arise such as monetary fines, cancellation of export licenses and possibility of imprisonment.

3.12 Protection of Information

All kinds of information, which are not publicly available or are not made publicly available by Arçelik are considered confidential including, but not limited to technical, operational, financial information. Confidential information is protected by Arçelik policies and applicable laws in countries we operate. Our suppliers strictly adhere to company policies and procedures to protect confidential information and do not share confidential information with third parties. Suppliers must create, record and retain all business-related information accurately and in full compliance with requirements of applicable laws. They also processes the personal information of its employees, business partners and customers in order to improve company processes and activities to the extent permitted by legislation. They do not share this personal data with third parties without the consent of the data owners.

3.13 Intellectual Property Rights

Arçelik does not give license, patent, industrial design or copyrights to its suppliers. The related suppliers are obliged to pay all costs, losses and additional costs including penalties of the parties (Arçelik, other suppliers and consumers) if the damage is supplier rooted due to intellectual and industrial rights violations.

4. IMPLEMENTATION PRINCIPLES

In the audits conducted to Arçelik suppliers, their compliance with the rules in this Policy is questioned, non-conformities are expected to be improved by initiating corrective and preventive actions, and improvements are checked by follow-up audits.

Arçelik may request removal of an employee of any of its suppliers, who acts against the relevant laws and regulations or who violates these rules or may terminate the contract with the relevant supplier.

Arçelik encourages and expects supplier employees to report any incompliant actions to this Policy. The following reporting channels can be used to report suspicious behaviour contrary to this Policy or violation of the rules in this Policy.

Web: Whistleblowers can report incompliant actions to this Policy by using the tab “Raise a Concern Online” on www.ethicsline.net.

Telephone: Whistleblowers can also raise their concerns by dialing Ethics Hotline phone numbers dedicated specifically to countries. Ethics Hotline phone numbers can be found from www.ethicsline.net through “Raise a Concern by Phone” tab.

Arçelik ensures that all investigations will be handled with absolute confidentiality and whistle-blowers will be protected. Arçelik will protect the confidentiality of the individual who has reported suspicious behaviour of the supplier incompliant to this Policy or possible violation of business ethics and will not tolerate any retaliation against that individual. If this Policy is revised by Arçelik, suppliers undertake to accept the revised Policy and commits to adapt Global Code of Conduct and related Code Policies and comply with the principles specified herein.

References

Arçelik Chemical Compliance Specifications (https://supplier.arcelik.com/en/enviroment)

Arçelik Global Code of Conduct (https://www.arcelikglobal.com/en/company/about-us/ourglobal-ethical-codes/)

Arçelik Policies (https://www.arcelikglobal.com/en/company/policies/)

International Labor Organization (ILO) Conventions Declaration on Fundamental Principles and Rights at Work

ISO14001

ISO45001

OECD Guidelines for Multinational Enterprises

OECD Due Diligence Guidance (Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas)

SA8000 United Nations Global Compact

United Nations Guiding Principles on Business and Human Rights United Nations Universal Declaration of Human Rights

Version Date: 29.05.2023

GLOBAL ENVIRONMENTAL POLICY

In line with our vision “Respecting the World, Respected the Worldwide” we commit to the continuous improvement of our environmental management system, and the protection of the environment, reduction of our impacts on the environment, and improvement of our environmental performance across the entire value chain in line with the principles of sustainable development and circular economy. Therefore, we have a global commitment to;

- Comply with the national and international environmental legislations, regulations and other obligations in the geographies where we operate,
- Communicate and cooperate with relevant institutions and organizations in developing legal regulations, other requirements, policies, and standards regarding environmental management in our business geographies,
- Implement beyond regulation national and/or international environment related standards to our products and productions,
- Follow global developments, scientific research, and technologies in terms of environmental management,
- Reduce and/or eliminate the environmental impacts of operational activities,
- Address our environmental risks and opportunities by integrating environmental management into our business processes and strategies, and take actions to minimize the environmental risks,
- Set targets to improve environmental performance, plan the actions, follow the results, and focus on continuous improvement for our products, production activities and suppliers,
- Evaluate the environmental impacts of new investments, mergers, and acquisitions, ensure the establishment of environmentally conscious business facilities with implementation this Policy, protection of the environment, management of the emergencies and environmental risks,
- Carry out activities to combat the climate crisis and contribute to transition to a low carbon economy, considering the climate-related risks and opportunities of our activities,
- Implement Arçelik’s sustainability approaches to all business activities and product life cycle stages,
- Control the environmental impacts of our products throughout their life cycle, and conduct studies to reduce these impacts by developing environmentally friendly products,
- Design and manufacture environmentally friendly products which are more energy and water efficient, durable, repairable, and recyclable,
- Focus on reducing energy consumption, water consumption, resource consumption, and chemical consumption by using the best available techniques and cleaner production technologies and using natural resources efficiently,
- Aim to increase energy efficiency studies as well as use of renewable energy resources,
- Determine the water risks arising from our sector and geographies in which we operate and conduct studies to manage these risks,
- Prioritize preventing waste generation, reducing waste, increasing reuse, recycling, recovery, reviewing the design processes by considering these principles and using waste as a resource whenever possible in line with the principles of Circular Economy
- Control air emissions to prevent air pollution,

- Focus on protecting ecosystems, habitats, all species especially endangered species and endemic species, preventing land degradation, maintaining, continuously improving and developing the capacity of natural ecosystems and aim to manage impacts on biodiversity in a sustainable manner,
- Aim to be a leader in the field of environment in our sector in which we operate, create synergy, share good practices, develop and expand cooperation, integrate good practice principles and standard into business processes,
- Train our employees and business partners about the environmental impacts of our work activities,
- Carry out trainings, audits, environmental performance monitoring, and awareness rising activities for the implementation of this Policy by our employees, dealers, distributers, subsidiaries, authorized services, suppliers (raw materials, components, logistics, etc.), contractors (waste companies, recyclers, construction companies, etc.), subcontractors, joint ventures, outsourcing partners and other operational stakeholders; encourage our business partners to reduce their environmental impact, increase and improve their environmental performance,
- Raise environmental awareness of the society and our entire value chain to leave a clean and healthy environment to the future generations.

With our above-mentioned principles, we work with all our strength to become a leading company in our sector by managing our activities in integration with our Quality, Energy, Occupational Health and Safety, Greenhouse Gas Management Systems, sustainability approach, Global Code of Conduct and related Policies, and Koç Group Environmental Policy.

1. DUTIES AND RESPONSIBILITIES

Environmental Policy is published, reviewed, and updated under the coordination of Arçelik Environmental Management Department when necessary. Arcelik's Board of Directors commits to and oversights the implementation of the policy.

Duties and responsibilities regarding the implementation of the Environmental Policy are described in the Company Management System Handbook.

Violations of this Policy may result in various sanctions, including termination of employment.

2. REFERENCE DOCUMENTS

Detailed explanations regarding this Policy and its implementation can be found in the Company Management System Handbook.

Version Date: 01.03.2023

GLOBAL OCCUPATIONAL HEALTH AND SAFETY POLICY

As Arçelik and its employees, within the framework of our vision of "Respecting the World, Respected Worldwide", we strive to determine and maintain the most appropriate working methods in order to create a safe and healthy workplace in accordance with our Occupational Health and Safety Management System, and we aim to further increase our OHS performance in all our processes with the relevant national and international legislation and regulations in line with our goals. Our commitments to these goals are as follows;

Based on our principle and the valuable saying of our founder, Mr. Vehbi Koç; **"*Our Most Valuable Asset is Our Human Resources*"** we aim**,**

- To create healthy and safe workplace with zero occupational accident and zero occupational disease approach,
- To detect and eliminate the hazards, risks and near miss situations in the workplace,
- To provide the necessary communication activities to understand the needs and expectations of our employees and other interested parties regarding OHS,
- To continuously improve our OHS performance by using the best technologies available,
- To take proactive measures by preparing the necessary plans for possible emergencies,
- To provide opportunities for all OHS trainings that may be necessary and to follow the effectiveness of the trainings,
- To deploy the lessons learned and best practices in OHS subjects to all our workplaces
- To follow and improve the OHS performance of contractors within the scope of our OHS Management System,
- Identifying and implementing the opportunities related to OHS, by integrating them into our processes and practices,
- Setting quantitative targets, creating action plans, tracking realization levels to achieve a successful OHS performance,
- To create a culture in which the habit of working safely and healthy is internalized and to provide the necessary resources,
- To act in accordance with the national and international legal regulations, collective labour agreement and other obligations for new investments and existing operations in all geographies we operate,
- To establish upon continuous improvement in our OHS activities by ensuring the participation of all levels of the organization and our stakeholders,

At Arçelik, human life is a priority and no work can be so important as to be done without taking safety and health precautions. Our employees act in accordance with all legal regulations regarding Occupational Health and Safety and our company policies, immediately report unsafe working conditions, accidents, injuries and unhealthy situations, identify emergency hazards and make appropriate preparations, know what to do in an emergency and do not come to work under the influence of drugs and alcohol.

In Arçelik, we prioritize human life. No work is so important than it can be performed without occupational health and safety measures. Our employees act according to all Occupational Health and Safety regulations, and company policies, and notify any unsafe working conditions through our communication channels. We promptly notify

any accident, injury, or unsafe condition. We identify our emergency scenarios and make necessary preparations; we know what needs to be done in case of an emergency. We do not come to work under the influence of drugs or alcohol.

All company employees, stakeholders and contractors are obliged to work under Arçelik OHS Policy requirements.

In order to fulfill this obligation, we manage our OHS-related activities in an integrated manner with our Quality, Energy, Environmental Management Systems, our Sustainability approach, our Global Business Ethics Principles and related Policies and Koç Group OHS Policy and we work with all our might to be an exemplary organization in terms of occupational health and safety in our sector and in the world.

DUTIES AND RESPONSIBILITIES

This Policy is published under the coordination of Arçelik OHS Corporate Safety Department Management, reviewed and updated when necessary. The implementation of the Policy is endorsed by the Board of Directors.

REFERENCE DOCUMENTS

Detailed explanations regarding this Policy and its implementation are available in the Company Management System Handbook.

Version Date: 01.03.2023

GLOBAL SANCTIONS AND EXPORT CONTROLS POLICY

1. PURPOSE AND SCOPE

The purpose of this Sanctions and Export Controls Policy (the "**Policy**") is to set out the rules to be considered by Arçelik Global (the "**Company**") in order to ensure compliance with the economic sanctions and export control obligations by setting minimum standards and criteria.

When applicable to their businesses, it is one of the main principles of the Company to fully comply with the economic sanctions administered by: the Republic of Turkey, the United Nations (the "**UN**"), the United States Government (the "**US**") and the European Union (the "**EU**"), (respectively, "**Turkey Sanctions**", "**UN Sanctions**", "**US Sanctions**" and the "**EU Sanctions**") as well as the economic sanctions and export controls administered by other jurisdictions, (collectively, the "**Sanctions**").

The Company is committed to carrying out its business in compliance with all applicable laws, rules and regulations and to maintaining the highest ethical standards in relation to its business activities.

The Company has implemented a Sanctions compliance framework to ensure it complies with all applicable Sanctions and can identify and mitigate the Sanctions risks confronting its business.

This Policy applies to all employees of the Company, Group Companies (*defined below*) and its Business Partners. In cases of conflict between the local laws and regulations, which are applicable in the countries that the Company operates and this Policy, the stricter provisions shall apply.

All employees of the Company and Group Companies are required to abide by this Policy. In case an employee of the Company and Group Companies become aware of any action that she/he believes to be inconsistent with this Policy, the applicable law or the Arçelik Global Code of Conduct or in case there is any requirement to have direct or indirect contact with a Sanctions Target, she/he will be required to seek immediate guidance. In such a case, he/she should contact her/his line managers and the Legal and Compliance Department of the Company, if necessary.

2. DEFINITONS

"**Business Partner**" means suppliers, distributors, authorized service providers, representatives, independent contractors and consultants.

"DPS" means Denied Party Screening which is the process of identifying whether or not Business Partners of the Company and Group Companies are listed in global lists for restricted persons, embargoed countries, and companies that are owned by these denied entities.

"Embargo" means a general term that is used as a government prohibition against the export or import of all or certain products to a particular country for economic or political reasons.

"EU" means the European Union.

"EU Sanctions" means the Sanctions adopted by the EU Council and implemented by the member countries.

"Export Control Regulations" mean the laws and regulations that regulate and restrict the import, export and reexport of technologies, information, goods and services for reasons of commerce, foreign policy and national security.

"Group Companies" means the entities of which the Company holds directly or indirectly more than 50% of share capital.

"International Organization" means an organization with an international membership, scope, or presence.

"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 latest consolidated financial report.

"Money Laundering" means the activities that involve taking criminal proceeds and disguising their illegal source in anticipation of ultimately using such criminal proceeds to perform legal and illegal activities.

"OFAC" means the Office of Foreign Assets Control of the United States Department of the Treasury.

"RFI" means request for information.

"Sanctions" has the meaning assigned to this term under Section 1 (Purpose and Scope) of this Policy.

"Sanctions Obligations" means any contractual obligation or commitment, form or undertaking in written or oral or other form etc., including but not limited to the loan, facility and other agreements, undertakings, bank opening forms etc.

"**Sanctions Target**" means;

- Any individual, entity, vessel or government which is a designated target of Sanctions (collectively, "**Listed Persons**") (*e.g.,* OFAC and SDNs);
- Companies owned 50% or more, directly or indirectly, by a Listed Person;
- Individuals or companies that are resident, incorporated, registered or located in countries or territories such as Crimea, Cuba, Iran, North Korea, Sudan and Syria that are subject to a comprehensive country or territory-wide Embargo as of the approval date of this Policy (*i.e.,* the "**Embargoed Countries**"), and
- Persons or companies owned or controlled by, or operating as agents of, the governments of Embargoed Countries or the Government of Venezuela.

"SDN" is a list of groups, and entities, such as terrorists and narcotics traffickers published by OFAC, designated under programs that are not country-specific. As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs."

"Sectoral Sanctions Identifications (SSI) List" refers to a list published by OFAC to identify persons operating in sectors of the Russian economy identified by the Secretary of the Treasury pursuant to Executive Order 13662. Directives found within the list describe prohibitions on certain dealings with the persons identified. SSI sanctions apply to persons on the SSI List, as well as companies 50% or more owned by SSI listed persons. However, the SSI List is not part of the Specially Designated Nationals (**SDN**) List, and therefore blocking sanctions do not apply to persons on the SSI list unless they are also on the SDN List or 50% or more owned by an SDN.

"Turkey Sanctions" refer to the sanctions and embargoes that are imposed by the Republic of Turkey and administered by the Ministry of Foreign Affairs.

"UN Sanctions" refers to economic sanctions imposed by the United Nations Security Council and implemented by U.N. member countries. The economic sanctions imposed by the United Nations, aim to achieve different objectives by weakening the target country or organization, and compelling and punishing the target country or organization. U.N. members implements sanctions under their national laws. All U.N. members are obliged to obey U.N. sanctions.[12]

"US Sanctions" means the Sanctions implemented by the U.S. State Department.

3. AUTHORITY AND RESPONSIBILITIES

The Board of Directors of the Company is responsible for overseeing the management of Sanctions compliance program (the "**Program**") and ensuring that the Company has adequate resources in place to effectively manage risks and implement the Program. The Company's Legal and Compliance department has overall responsibility for the Program and for ensuring that their requirements are effectively and appropriately communicated to the persons and entities that are required to comply with them.

The business units and operations, as the first line of defense, are responsible for implementing and/or supporting the Company's Sanctions-related procedures and controls in accordance with the requirements in this Policy. These units must ensure adherence to the requirements in this Policy and associated operating procedures.

The Chief Legal and Compliance Officer ("**CCO**") is responsible for the administration of the Program, implementing its requirements across the Company and monitoring and assessing the effectiveness of the internal controls and procedures that are intended to ensure compliance with the requirements of the Program.

[12] https://www.un.org/securitycouncil/sanctions/information

The Company's Legal and Compliance Department, as the second line of defense, is responsible for the monitoring, assessment, and reporting of the Sanctions risks. The Legal and Compliance Department of the Company has the day-to-day responsibility for: (i) assessing the Company's Sanctions risks; (ii) ensuring that the Program is capable of mitigating those Sanctions risks and that the Program is supplemented/enhanced as needed; (iii) responding to queries about this Policy and Sanctions-related compliance queries from the employees; (iv) developing and providing training to relevant employees; and (v) reporting any actual or suspected breaches of the requirements of this Policy to the Board in a timely manner. An annual risk assessment must be conducted by Legal and Compliance Department in order to follow up the risks associated with the Sanctions within the overall risk management framework.

Internal audit, as the third line of defense, is responsible for carrying out independent testing of the Company's Sanctions-related policies, procedures and controls.

4. GENERAL PRINCIPLES

Governments and International Organizations may limit the transfer or procurement of certain goods and services, technical data, information, materials and technology in accordance with the Sanctions and Export Control Regulations. Economic or full or partial Embargoes may be imposed on certain countries, organizations or individuals for political, military or social reasons.

As a globally acting enterprise, the Company aims to take effective and necessary precautions for it and its Group Companies to manage the risks pertaining to the Sanctions and Export Control Regulations.

Products and services of the Company must not be traded, directly or indirectly with Sanctions Targets or the Embargoed Countries unless the Company's Legal and Compliance Department has first confirmed that the prospective transaction does not violate applicable sanctions or otherwise expose the Company to such risk. In case the relevant business units have any doubt or in exceptional situations (such as transacting with a party which is included in the *Sectoral Sanctions Identifications List* (**"SSI"**); transacting with an Embargoed Country in a sector which is not subject to Sanctions, etc), the Company's Legal and Compliance Department must be informed for preapproval. Such transaction may only be confirmed by Company's Legal and Compliance Department after the final approval of the Legal and Compliance Department of Koç Holding to ensure that the prospective transaction does not violate applicable Sanctions or otherwise expose the Koç Group to Sanctions risk.

It is of utmost importance for the Company to comply with any laws and regulations applicable to it, including Sanctions and Export Control Regulations, in the countries in which it operates and to fulfil its contractual obligations. For this reason:

- Unless the necessary arrangements are made and the required licenses are obtained[13] any activity subject to Sanctions or constitutes a breach of applicable Export Control Regulations or any Sanctions Obligations must be ceased;
- Due diligence procedures must be performed in order to determine whether a third party is subject to Sanctions;
- Ongoing monitoring must be performed at a frequency determined according to the result of the due diligence procedures. If a prohibited transaction or any activity subject to Sanctions or constitute a breach of applicable Export Control Regulations is detected during an ongoing monitoring, the related process should be ceased immediately and the Company's Legal and Compliance Department should be informed immediately. Once such information is received by the Company's Legal and Compliance Department, Legal and Compliance Department of Koç Holding will be informed.

Payments and collection of revenues must be made and recorded to the books in accordance with laws and regulations of the countries in which the Company conducts its' business activities.[14] The Company shall not be involved in Money Laundering, terrorist financing and the financing of mass destruction weapons activities.

For such purpose the Company must:

- Know who their customers and Business Partners are;
- Comply with applicable laws, regulations and Arçelik Global Code of Conduct and related Policies;
- Always ensure accuracy in financial and commercial records;
- Keep records of all its activities in a safe and proper manner;
- Perform third party screenings/due diligence in compliance with applicable regulations.

Failure to comply with this Policy could lead to, but is not limited with, the following:

- Imprisonment of employees (as a result of violation of certain Sanctions);
- Significant financial penalties for both the Company and their employees;
- Adverse public reputation;
- Loss of business;
- Cancellation of incentives;
- Termination of agreements;
- Fall in stock prices;
- Poor or no access to international financing;
- Credit recall;
- Seizure of the Company's assets.

[13] The licenses must be obtained for at least 10 years unless otherwise stated in the relevant regulations.
[14] Please refer to Arçelik Global Anti Money Laundering Policy for details.

5. IMPLEMENTATION

Within the scope of the due diligence procedures, Denied Party Screening ("**DPS**") must be conducted via the third-party screening tool. Initial due diligence must be performed, before any engagement with a new Business Partner or other third party in accordance with the applicable regulations. While performing the due diligence activities, the domestic lists shall be also taken into consideration, to the extent technically possible together with global sanctions lists. Due diligence procedures must be conducted not only prior to any engagement but also during the course of the business relationship on a periodical basis. If red flags (such as the risk of transactions with the Sanctions Targets, Money Laundering activities, etc.) are detected by the relevant departments of the Company at any time during the course of the business relationship, the Legal and Compliance Department of the Company must be informed immediately. The Legal and Compliance Department performs enhanced due diligence activities and informs the related business unit about the precautions to be taken including, but not limited to the termination of the business relationship or cancellation of agreements. In case of doubt, the Company's Legal and Compliance Department will consult to the Legal and Compliance Department of Koç Holding.

Depending on the results of the DPS, it is at the sole discretion of the Legal and Compliance Department of the Company to decide whether the business transactions can be initiated or continued.

The Company must ensure that the contracts with Business Partners and other third parties includes relevant articles regarding their understanding and obligations to comply with this Policy.

6. US PERSON INSULATION

US Persons, including employees who are US Persons, must not participate in any transaction involving an Embargoed Country or other US Sanctions Target unless OFAC has licensed or authorized the involvement of US Persons in that transaction. "US Persons" include anyone while in the United States; any US citizen or green card holder, wherever located (including dual nationals of the US and another country); any US-incorporated entity, or anyone employed by a US entity, as well as US-owned or controlled non-US entities under certain US Sanctions. The US Person Insulation Protocol attached at Appendix [1] provides additional guidance and instructions on the exclusion of US Persons as necessary to comply with applicable US Sanctions.

For more information regarding insulation of US Persons, the Company's Legal and Compliance Department shall be contacted.

7. TRANSPARENCY REQUIREMENTS

Employees of the Company including Group Companies shall not make any statements or engage in any conduct designed to evade Sanctions, the requirements of this Policy or that may be construed as facilitation of Sanctions evasion or sanctionable activity. No information in payment instructions, transaction documents and/or counterparty data

should be altered, deleted or concealed in order to evade Sanctions or impede the identification of a Sanctions issue. Employees should reject and report to the Legal and Compliance Department of the Company, any request from a counterparty to omit or conceal names, addresses or other information relating to a Sanctions Target in transaction records or other commercial documents. Any such lack of transparency in regard to a Sanctions issue will not be tolerated.

8. REQUESTS FOR INFORMATION

The Company and/or Group Companies may receive requests for information ("**RFI**") regarding certain transactions, counterparties, etc. from corresponding or counterparty banks. Such RFIs may be received via email, fax or other means. Any employee that receives a Sanctions-related RFI should immediately forward the RFI to the Legal and Compliance Department of the Company for review. All responses to Sanctions-related RFIs require approval from the Legal and Compliance Department of the Company and must address the entire request, be accurate and not misleading.

All documents related to RFIs, including all relevant internal correspondence, documentation evidencing the approval of the RFI response by the Legal and Compliance Department of the Company and any other documentation related to the handling of the RFI must be saved and archived in an electronic format.

The Company's Legal and Compliance Department shall contact, Legal and Compliance Department of Koç Holding for the follow up of this RFI.

9. VIOLATIONS OF THIS POLICY

Violations of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by any third parties, their contracts, if any, must be terminated with immediate action.

If you know or suspect that there has been a violation of this Policy and/or the applicable law, you should immediately report the violation (or suspected violations) to the Legal and Compliance Department of the Company. In addition, if you have any questions or concerns please contact Legal and Compliance Department of the Company, alternatively you may also report your questions or concerns via the below mentioned reporting channels:

Web: www.ethicsline.net
Hotline Phone Numbers as listed in the web site:
https://www.arcelikglobal.com/en/company/about-us/global-code-of-conduct/

In addition to the channels described you may also report any violation of this Policy to Koç Holding's Ethics Hotline via the following link: "kocsnow.koc.com.tr/hotline".

This Policy will be periodically reviewed by the Arçelik Legal and Compliance Department
to ensure compliance with new or revised laws and regulations.

10. APPENDIX I- US PERSON INSULATION PROTOCOL

Insulation of US Elements from Business involving Sanctions Targets[15]

I. Reason for this Protocol

A. To guard against the participation of the Company and Group Companies and all operations globally in transactions that might violate applicable economic sanctions or trade embargoes ("**Sanctions**").

B. Because Sanctions violations can result in criminal penalties and personal liability for employees who fail to comply, all employees must understand their obligations and strictly observe this Protocol both for their own protection and for the protection of their fellow employees.

II. Sanctions Targets

A. Each of the jurisdictions in which the Company and Group Companies operate may enforce a range of Sanctions against target persons, entities, vessels or countries ("**Sanctions Targets**") in accordance with United Nations' mandates or for other reasons.

B. US economic sanctions generally target a wider range of countries, persons and entities than Sanctions imposed by the other jurisdictions in which the Company and Group Companies operate. US Sanctions Targets include persons, entities and vessels designated by the US Office of Foreign Assets Control ("**OFAC**"), as reported on the OFAC website.[16] In addition to such Specially-Designated Nationals ("**SDN**s") and Foreign Sanctions Evaders ("**FSE**s"), OFAC and other US Authorities currently impose comprehensive sanctions against Crimea, Cuba, Iran, North Korea, Sudan and Syria. Finally, OFAC has imposed Sanctions on certain entities that operate in Russia's financial, defense and energy sectors by putting them on OFAC's Sectoral Sanctions Identifications list ("**SSI List**").

C. US Sanctions requirements apply to US Persons globally and also to transactions by **any person** that involves the territory or financial system of the United States or international transfers of export-controlled US origin goods (collectively, "**US Elements**").

[15] This protocol does not address US or EU export control regulations and licensing requirements. See [other company policies] for guidance on such regulations and requirements.

[16] See http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx and http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/ssi_list.aspx.

D. Questions to ask to determine whether a transaction that involves US Elements might create US Sanctions risk include:

- Is a transaction party on OFAC's SDN list or owned by an SDN?[17]
- Is a transaction party located in or supplying goods or services to/from Crimea, Cuba, Iran, North Korea, Sudan or Syria (the "**Embargoed Countries**")?
- Is a transaction party on the SSI List or owned by a company that appears on the SSI List?
- Is a transaction party owned in whole or part by, or acting on behalf of, the governments of Cuba, Iran, Sudan or Syria or a corporation owned by one of these governments?
- Is a transaction party a national of Cuba or owned in whole or part by nationals of Cuba (other than Cuban nationals located in the United States or permanent residents of a third country)?

III. Our Policy

A. We comply with all Sanctions laws, including export controls, applicable to our transactions.

B. We will not participate in transactions that would expose any of the participants to compliance risk under applicable Sanctions.

C. We will not participate in transactions designed or intended to evade the Sanctions laws of jurisdictions in which we do business.

In cases of doubt, all employees must consult the Company's Legal and Compliance Department.

IV. Recusal of US Person employees

A. "US Persons", including employees who are US Persons, must not participate in any transaction involving an Embargoed Country or other US Sanctions Target unless OFAC has licensed or authorized the involvement of US Persons in that transaction. "US Persons" include anyone while in the United States; any US citizen or green card holder, wherever located (including dual nationals of the US and another country); any US-incorporated entity, or anyone employed by a US entity, as well as US-owned or controlled non-US entities under certain US Sanctions.

- The Company and Group Companies -except Beko U.S., Inc. - are not US Persons, but any of its offices and employees in the United States, and any employee globally with a US passport or green card are US Persons.

[17] Denied Party Screening should be run for all transaction regardless of US element involvement.

B. In the absence of an applicable license, authorization or exemption, US Sanctions prohibit the involvement of US Persons in transactions with Embargoed Countries and other US Sanctions Targets.

- Sanctions imposed on the companies that appear on the SSI List are more limited in scope and prohibit US Persons from transacting in, providing financing for, or otherwise dealing in new debt (depending on the SSI-listed entity) or, in certain instances, new equity for these persons, their property, or their interests in property.

C. Accordingly, all employees who are US citizens or hold a US green card (including non-US citizens while in the United States) must not participate in or otherwise support or facilitate transactions involving US Sanctions Targets unless OFAC has licensed or otherwise permitted such transactions.[18]

D. Specifically, if you are a US Person, located in the United States, or a non-US person director or employee of a US entity while acting on behalf of the US entity:

1. Do not provide any commercial advice, assistance or other support in connection with OFAC-prohibited business involving Embargoed Countries or other US Sanctions Targets;

2. Do not supervise, authorize or approve any OFAC-prohibited business involving US Sanctions Targets or manage or direct the conduct of other personnel in regard to such business;

3. Do not participate in the re-design or restructuring of any transactions, operations, products or services for the purpose of facilitating OFAC-prohibited business involving US Sanctions Targets;

4. Do not provide corporate services (*e.g.*, accounting, logistics, contract administration, technical services) specifically to support OFAC-prohibited business involving US Sanctions Targets.

[18] The SSI List Sanctions do not prohibit US Person involvement in all transactions with SSI Listed companies. Rather the SSI List sanctions prohibit only limited activity. The SSI List should be consulted for details of these prohibitions, but they are in summary: Directive 1 – transactions that involve new equity or new debt of a Directive 1 sanctioned entity with a term of more than 30 days; Directive 2 – transactions that involve new debt of a Directive 2 sanctioned entity with a term of more than 90 days; Directive 3 – transactions that involve new debt of a Directive 3 sanctioned entity with a term of more than 30 days, and; Directive 4 - transactions involving exploration or production for deepwater, Arctic offshore, or shale projects that have the potential produce oil in the Russian Federation and involve a Directive 4 sanctioned entity. The same corresponding prohibitions apply to entities 50% or more owned by one or several SSI Listed entities. Therefore, US Persons may participate in transactions with such SSI Listed companies subject to the requirement that those transactions do not involve prohibited transactions or any other US Sanctions Targets.

5. Do not refer OFAC-prohibited business involving US Sanctions Targets to any other person or issue any powers of attorney in relation to specific transactions with US Sanctions Targets.

6. Do not provide any services listed above in connection with debt or equity, as applicable, to entities that appear on the SSI List.

E. Employees who are not US Persons must not involve US Persons, US-origin goods or services, or the US financial system in any OFAC-prohibited business involving US Sanctions Targets.

F. Thus, if you are not a US Person and your transaction involves US Sanctions Targets, unless authorized by an OFAC license or authorization or otherwise authorized by the Compliance Officer:

1. Do not work on that transaction while you are in the United States;

2. Do not ask a US Person (including a US citizen or green card holder outside the United States) to assist you with that transaction;

3. Do not discuss that transaction with a US Person, except to alert them to the need for compliance with this protocol or raise an OFAC compliance issue;

4. Do not include US Persons in e-mail chains in furtherance of that transaction;

5. Do not attempt to involve US Persons in that transaction by withholding information about its connection to a US Sanctions Target; and

6. Do not use credit or other assets provided by US Persons to finance transactions with US Sanctions Targets or provide US Persons with funds derived from such transaction.

G. Examples: The following are examples of actions that would violate this Policy:

- A US citizen employed by the Company in Turkey negotiates a sale of refrigerators to a Syrian business;
- A Turkish citizen employed by the Company in Turkey negotiates a contract with a company in Sudan while temporarily working from an office in New York;
- From Turkey, the same non-US employee orders parts from a US-based supplier for sale to a customer in Iran; or
- A US green card holder employed by the Company in Turkey approves a contract with an OFAC-listed SDN.

H. Recusal of US Person Committee Members

- As noted above, anyone affiliated with the Company and the Group Companies who is a US Person may not approve, authorize, advise on or otherwise provide support or assistance in connection with business involving US Sanctions Targets or Embargoed Countries unless US law permits their involvement in a particular case (*e.g.*, because OFAC has licensed the transaction or because of the limited nature of the SSI sanctions).

- A strict recusal rule therefore applies to any US Persons who may now or in the future serve on the Company and the Group Companies' managing boards and committees, meaning that they may not participate in any portion of a meeting of such board or committee, including planning or votes, in furtherance of OFAC-prohibited business involving US Sanctions Targets or Embargoed Countries.

- Thus, unless authorized to participate by the Compliance Officer, US Persons should leave the meeting room and/or drop off video/audio conferences during such interval that a board or executive committee may take action specifically in furtherance of business involving US Sanctions Targets or Embargoed Countries.

- Clarification regarding Compliance Advice: Any member of a committee may and routinely will seek and consider advice provided by US Persons on compliance with OFAC and other Sanctions regulations and the Company and Group Companies' exposure to US Sanctions risks. In this context, US Person members of or advisors the Company and Group Companies' boards and committees may address sanctions compliance issues on behalf of the Company and Group Companies, while at the same time recusing themselves from any commercial planning or decisions in furtherance of OFAC-prohibited business with US Sanctions Targets or Embargoed Countries.

- In regard to any minutes of meetings recorded by the respective boards and committees, for any meeting in which voting or other action in furtherance of OFAC-prohibited business with US Sanctions Targets or Embargoed Countries is recorded, such minutes should indicate the manner in which any US Persons in attendance recused themselves from such action (*e.g.*, left the room, dropped off the conference call), before minuting the discussion and/or decisions related to the US Sanctions Targets.

- Board and committee members (and executives generally) who are not US Persons should not include US Persons in emails or other communications regarding the commercial aspects of OFAC-prohibited business with US Sanctions Targets or Embargoed Countries (in contrast to requests for compliance advice), and should consult the Compliance Officer in cases of doubt.

- The respective boards and committees will not approve or authorize any OFAC-prohibited business with US Sanctions Targets or Embargoed Countries if, following the recusal of all US Person members, the remaining members do not exceed the number of recused US Person members.

V. Additional Guidance for US Person Employees

A. The OFAC sanctions do not extend to passive awareness by US Person employees of the Company and Group Companies' activities involving US Sanctions Targets or Embargoed Countries, as long as the US Persons do not use their awareness of such business to engage in unauthorized activity that facilitates OFAC-prohibited business.

B. Publication and distribution to US Person employees of general purpose management reports or financial statements, disclosing costs/revenues/profits and other information about the Company and Group Companies' business with the Embargoed Countries in the context of the Company and Group Companies' global business activity, would not violate this Policy as long as the US Persons do not participate in any commercial deliberations or decision making in furtherance of unauthorized OFAC-prohibited business.

C. US Persons should consult the Company's Legal and Compliance Department whenever they have questions or concerns about the subject matter of this Protocol.

Version Date: 17.10.2022

GLOBAL HUMAN RIGHTS POLICY

1. PURPOSE AND SCOPE

This Human Rights Policy ("**the Policy**") is a guide that reflects Arçelik and its Group Companies' approach and standards in relation to Human Rights and shows the importance Arçelik and its Group Companies' attribute to respect for Human Rights.

All employees, directors and officers of Arçelik and its Group Companies shall comply with this Policy. As a Koç Group company, Arçelik and its Group Companies also expect and take necessary steps to ensure that all its Business Partners - to the extent applicable - comply with and/or act in line with this Policy.

2. DEFINITIONS

"Business Partners" include suppliers, distributors, authorized service providers, representatives, independent contractors and consultants.

"Group Companies" means the entities of which Arçelik holds directly or indirectly more than 50% of share capital.

"Human Rights" are rights inherent to all human beings, regardless of gender, race, color, religion, language, age, nationality, difference of thought, national or social origin, and wealth. This includes the right to an equal, free and dignified life, among other Human Rights.

"**ILO**" means The International Labor Organization

"**ILO Declaration on Fundamental Principles and Rights at Work"** [19] is an ILO declaration adopted that commits all member states whether or not they have ratified the relevant Conventions, to respect, and promote the following four categories of principles and rights in good faith:

- Freedom of association and effective recognition of collective bargaining,
- Elimination of all forms of forced or compulsory labor,
- Abolition of child labor,
- Elimination of discrimination in employment and occupation.

"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 latest consolidated financial report.

"OECD" means The Organization for Economic Co-operation and Development

"OECD Guidelines for Multinational Enterprises" [20] aims to develop a state-sponsored corporate responsibility behavior that will maintain the balance between competitors in the international market, and thus, increase the contribution of multinational companies to sustainable development.

[19] https://www.ilo.org/declaration/lang--en/index.htm
[20] http://mneguidelines.oecd.org/annualreportsontheguidelines.htm

"UN" means the United Nations.

"UN Global Compact"[21] 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, labor, the environment and anti-corruption.

"UN Guiding Principles on Business and Human Rights" [22] is a set of guidelines for states and companies to prevent, address and remedy Human Rights abuses committed in business operations.

"Universal Declaration of Human Rights (UDHR)" [23] is a milestone document in the history of Human Rights, drafted by representatives with different legal and cultural backgrounds from all regions of the world, proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental Human Rights to be universally protected.

"Women's Empowerment Principles"[24] (WEPs) a set of principles offering guidance to business on how to promote gender equality and women's empowerment in the workplace, marketplace and community. Established by UN Global Compact and UN Women, the WEPs are informed by international labor and Human Rights standards and grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women's empowerment.

"Worst Forms of Child Labour Convention (Convention No. 182)"[25] means the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour.

3. GENERAL PRINCIPLES

As a globally acting Koç Group company, Arçelik and its Group Companies, take the Universal Declaration of Human Rights (UDHR) as its guide, and maintain a respectful understanding of Human Rights for its stakeholders in countries where it operates. Creating and maintaining a positive and professional working environment for its employees is the main principle of Arçelik and its Group Companies. Arçelik and its Group Companies act in compliance with the global ethical principles in subjects such as recruitment, promotion, career development, wage, fringe benefits, and diversity and respects its employees' rights to form and join organizations of their own choosing. Forced labor and child labor and all forms of discrimination and harassment are expressly prohibited.

[21] https://www.unglobalcompact.org/what-is-gc/mission/principles
[22] https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf
[23] https://www.un.org/en/universal-declaration-human-rights/
[24] https://www.weps.org/about
[25] https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

Arçelik and its Group Companies primarily take into consideration the below mentioned international standards and principles regarding Human Rights:

- ILO Declaration on Fundamental Principles and Rights at Work (1998),
- OECD Guidelines for Multinational Enterprises (2011),
- UN Global Compact (2000),
- UN Guiding Principles on Business and Human Rights (2011),
- Women's Empowerment Principles (2011).
- Worst Forms of Child Labour Convention (Convention No. 182), (1999)

4. COMMITMENTS

Arçelik and its Group Companies respect the rights of its employees, directors, officers, shareholders, Business Partners, customers, and all other individuals affected by its operations, products or services by fulfilling the principles of the Universal Declaration of Human Rights (UDHR) and the ILO Declaration on Fundamental Principles and Rights at Work.

Arçelik and its Group Companies undertake to treat all employees in an honest and fair manner, and to provide a safe and healthy working environment that respects human dignity while avoiding discrimination. Arçelik and its Group Companies prevent complicity in human rights violations.

Arçelik and its Group Companies may also apply additional standards considering vulnerable and disadvantaged groups who are more open to the negative Human Rights impacts and require particular attention. Arçelik and its Group Companies consider the specific circumstances of groups whose rights are further elaborated by United Nations instruments: indigenous peoples; women; ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families, as indicated in the UN Guiding Principles on Business and Human Rights.

Diversity and Equal Recruitment Opportunities

Arçelik and its Group Companies strive to employ individuals from different cultures, career experiences and backgrounds. Decision making processes in recruitment depend on job requirements and personal qualifications regardless of race, religion, nationality, gender, age, civil status and disability.

Non-Discrimination

Zero-tolerance towards discrimination is a key principle in the entire employment process, including promotion, assignment and training. Arçelik and its Group Companies expect all its employees to demonstrate the same sensibility in their behavior towards each other.

Arçelik and its Group Companies care to treat its employees equally by offering equal remuneration, equal rights and opportunities. All kinds of discrimination and disrespect founded on race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities and political opinion are unacceptable.

Zero Tolerance to Child / Forced Labor

Arçelik and its Group Companies strongly oppose child labor, which causes children's physical and psychological harm, and interferes with their right to education. In addition, Arçelik and its Group Companies oppose all forms of forced labor, which is defined as work that is performed involuntarily and under the menace of any penalty.

Pursuant to Conventions and Recommendations of the ILO, the Universal Declaration of Human Rights, and the UN Global Compact, Arçelik and its Group Companies have a zero-tolerance policy towards slavery and human trafficking and expects all its Business Partners to act accordingly.

Freedom of Organization and Collective Agreement

Arçelik and its Group Companies respect employees' right and freedom of choice to join a trade union, and to collectively bargain without feeling any fear of retaliation. Arçelik and its Group Companies are committed to a constructive dialogue with the freely chosen representatives of its employees, represented by a legally recognized labor union.

Health and Safety

The protection of health and safety of the employees, and other persons which are, for any reason, present in a work area is one of the top concerns of Arçelik and its Group Companies. Arçelik and its Group Companies provide a safe and healthy working environment. Arçelik and its Group Companies take necessary security measures in work places in a manner that respects the dignity, privacy, and reputation of each person. Arçelik and its Group Companies comply with all relevant regulations and implements all required security measures for all its working areas.

In the case of finding out any unsafe conditions or unsafe behaviors in the working areas, Arçelik and its Group Companies take necessary actions immediately to ensure the health, safety, and security of its customers and employees.

No Harassment and Violence

A key aspect to safeguarding the personal dignity of employees is to ensure that harassment or violence does not occur, or if it occurs sanctioned adequately. Arçelik and its Group Companies are committed to providing a workplace free of violence, harassment, and other insecure or disturbing conditions. As such, Arçelik and its Group Companies do not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse, or threats.

Working Hours and Compensation

Arçelik and its Group Companies comply with the legal working hours in line with the local regulations of the countries where it operates. It is crucial that employees have regular breaks, vacations, and establish an efficient work-life balance.

The wage determination process is established in a competitive manner according to the relevant sectors and the local labor market, and in accordance with the terms of collective bargaining agreements if applicable. All compensations, including social benefits are paid in accordance with the applicable laws and regulations.

Employees may request further information from the officer or department in charge of compliance regarding the laws and regulations that regulate working conditions in their own countries, if they wish so.

Personal Development

Arçelik and its Group Companies provide its employees with opportunities to develop their talent and potential, and to build their skills. Regarding human capital as the valuable resource, Arçelik and its Group Companies put effort into the employees' comprehensive personal development by supporting them with internal and external trainings.

Data Privacy

In order to protect the personal information of its employees, Arçelik and its Group Companies maintain high level data privacy standards. Data privacy standards are implemented in accordance with related legislations.

Arçelik and its Group Companies expect the employees to comply with data privacy laws in each of the countries it operates.

Political Activities

Arçelik and its Group Companies respect its employees' legal and voluntary political participations. Employees may make personal donations to a political party or a political candidate or engage in political activities outside working hours. It is, however, strictly forbidden to use company funds or other resources for such donations or any other political activity.

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of Arçelik and its Group Companies are responsible for complying with this Policy, implementing and supporting the relevant Arçelik and its Group Companies' procedures and controls in accordance with the requirements in this Policy. Arçelik and its Group Companies also expect and take necessary steps to ensure that all its Business Partners to the extent applicable complies with and/or acts in line with this Policy.

This Policy has been prepared in accordance with the Koç Group Human Rights Policy. If there is a discrepancy between the local regulations applicable in the countries where Arçelik and its Group Companies operate, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Arçelik Global Code of Conduct, you should report this incident via the below mentioned reporting channels:
Web: www.ethicsline.net
Hotline Phone Numbers as listed in the web site:
https://www.arcelikglobal.com/en/company/about-us/global-code-of-conduct/

The Legal and Compliance Department is responsible for arranging, periodically reviewing and revising the Global Human Rights Policy when necessary, while the Human Resources Department is responsible for the implementation of this Policy.

Arçelik and its Group Companies' employees may consult the Arçelik Human Resources Department for their questions related to the implementation of this Policy. 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.

Version Date: 17.10.2022

GLOBAL ANTI DISCRIMINATION AND ANTI HARASSMENT POLICY

1. PURPOSE AND SCOPE

The purpose and scope of this Global Anti Discrimination and Anti Harassment Policy (“**the Policy**”) is to set out the rules to be considered by Arçelik and its Group Companies in order to maintain a workplace free of any form of Discrimination, and Harassment, including Sexual Harassment.

All employees, directors and officers of Arçelik and its Group Companies shall comply with this Policy, which is an integral part of Koç Group Code of Ethics[26] and Arçelik Global Code of Conduct. Arçelik and its Group Companies also expect and take necessary steps to ensure that all its Business Partners comply with and/or act in line with this Policy.

2. DEFINITIONS

“Business Partners” include suppliers, distributors, authorized service providers, representatives, independent contractors and consultants.

“Discrimination” is any unfair treatment or arbitrary distinction based on a person’s race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities, political opinion or other status prohibited by law.

“Group Companies” means the entities of which Arçelik holds directly or indirectly morethan 50% of share capital.

“Harassment” is any inappropriate and unwanted behavior that could reasonably be anticipated or interpreted to offend or humiliate another person.

“Human Rights” are rights inherent to all human beings, regardless of gender, race, color, religion, language, age, nationality, difference of thought, national or social origin,and wealth. This includes the right to an equal, free and dignified life, among other Human Rights.

“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 latest consolidated financial report.

“**Sexual Harassment”** is described as any unwanted sexual advance, request for sexual favor, verbal or physical sexual conduct or gesture, or any other sexual behavior that may reasonably be anticipated or interpreted to cause offence or humiliation to another.

[26] https://cdn.koc.com.tr/cmscontainer/kocholding/media/koc/01hakkinda/uyum/policies/koc-group-code-of-ethics.pdf

"Universal Declaration of Human Rights (UDHR)"[27] is a milestone document in the history of Human Rights, drafted by representatives with different legal and cultural backgrounds from all regions of the world, proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental Human Rights to be universally protected.

"Workplace" is where employees work for Arçelik and its Group Companies. Such a place can range from physical spaces such as office buildings, factories etc., or virtual workplace which is defined as any work environment that is not located in one physical location.

3. GENERAL PRINCIPLES

As a globally acting Koç Group company, Arçelik and its Group Companies, take the Universal Declaration of Human Rights (UDHR) as its guide, and maintain a respectful understanding of Human Rights for its stakeholders in countries where it operates. Creating and maintaining a positive and professional working environment for its employees is the main principle of Arçelik and its Group Companies.
All forms of Discrimination and Harassment, including Sexual Harassment at the workplace are expressly prohibited.
It is among Arçelik and its Group Companies' objectives to provide a working environment that is compatible with human dignity and without Discrimination or injustice and where Arçelik and its Group Companies aim to gather individuals with different backgrounds, cultures, career experiences, approaches and perspectives to develop new ideas and solutions. Accordingly, Arçelik and its Group Companies make recruitment decisions based on work needs, work requirements and personal qualifications regardless of race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities and political opinion or other status prohibited by law.

4. COMMITMENTS

Arçelik and its Group Companies are committed to maintain a work environment free of Discrimination and Harassment including Sexual Harassment, where all individuals are treated with respect and dignity, can contribute fully and have equal opportunities.

The key element of Arçelik and its Group Companies' commitment to equal opportunity is zero tolerance for Discrimination and Harassment based on, or because of, an individual's race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities and political opinion or other status prohibited by law. Such Harassment for any employees, directors and officers of Arçelik and its Group Companies or any of its Business Partners, is unlawful and will not be tolerated.

[27] https://www.un.org/en/universal-declaration-human-rights/

Non-Discrimination

Arçelik and its Group Companies care to treat its employees equally by offering equal remuneration, equal rights and opportunities. All kinds of Discrimination and disrespect founded on race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities and political opinion or other status prohibited by law are unacceptable.

Zero tolerance towards Discrimination is a key principle in the entire employment process, including recruitment, promotion, assignment, compensation, transfers, discipline, demotions, terminations, access to benefits and training. Arçelik and its Group Companies expect all its employees to demonstrate the same sensibility in their behavior towards each other.

Any employee who is found to have discriminatory conduct will be subject to corrective action, up to and including termination. If any Business Partner found to be engaging in any type of unlawful Discrimination, their contracts may be terminated.

Prohibition Against Violence and Harassment, Including Sexual Harassment

A key aspect to safeguarding the personal dignity of employees is to ensure that any form of Harassment or violence does not occur, or if it occurs sanctioned adequately. Arçelik and its Group Companies committed to a workplace free of violence, Discrimination and Harassment based on or because of an individual's race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities and political opinion or other status prohibited by law.

As such, Arçelik and its Group Companies do not tolerate any form of physical, verbal, sexual or psychological Harassment, violence, bullying, abuse, or threats.

Harassment may take the form of (but are not limited to) words, gestures, or acts that irritate, alarm, abuse, demean, threaten, belittle, humiliate, or embarrass another person, or that create an intimidating, aggressive, or offensive work environment. Harassment usually implies a series of incidents. Harassment can also be described as unwelcome comments that are gender-related, sexual, or ethnic in nature; religious slurs; racial insults; age-based remarks; jokes, epithets, offensive or derogatory comments, emails, voice mails, or written or pictorial material that makes fun of or insults a person or a group based on a protected classification; or similar inappropriate conduct.

Disagreements about work performance or other work-related issues are not normally considered Harassment.

In addition to the above types of Harassment, Arçelik and its Group Companies also have a zero- tolerance principle toward Sexual Harassment in the workplace.

Although Sexual Harassment is most often associated with a pattern of behavior, it may also take the form of a single occurrence. Sexual Harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

Any employee who is found to violate these rules will be subject to corrective action, up to and including termination. If this Policy is violated by a Business Partner, their contracts may be terminated.

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of Arçelik and its Group Companies are responsible for complying with this Policy, implementing and supporting the relevant Arçelik and its Group Companies' procedures and controls in accordance with the requirements in this Policy. Arçelik and its Group Companies also expect and take necessary steps to ensure that all its Business Partners comply with and/or acts in line with this Policy.

This Policy has been prepared in accordance with the Arçelik Global Human Rights Policy[28]. If there is a discrepancy between the local regulations applicable in the countries where Arçelik and its Group Companies operate, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Arçelik Global Code of Conduct[29], you should report this incident via the below mentioned reporting channels:

Web: www.ethicsline.net
Hotline Phone Numbers as listed in the web site:
https://www.arcelikglobal.com/en/company/about-us/global-code-of-conduct/

In addition to the channels described you may also report any violation of this Policy to Koç Holding's Ethics Hotline via the following link: "koc.com.tr/hotline".

All allegations of behaviour that violates this policy will be investigated promptly and thoroughly in accordance with the process described in Global Code of Conduct Operations Policy[30]. Additionally, retaliation, harassment or victimization of anyone raising a concern is not tolerated and individuals making a disclosure will retain their anonymity unless they agree otherwise as described in Global Whistleblowing Policy[31].

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.

The Legal and Compliance Department is responsible for arranging, periodically reviewing and revising the Global Anti Discrimination and Anti Harassment Policy when necessary as well as training the employees about Global Code of Conduct and Related Policies including the prevention of Discrimination, Harassment including Sexual Harassment and Human Rights violations at the workplace. Human Resources Department is responsible for the implementation of this Policy. Arçelik and its Group Companies' employees may consult the Arçelik Human Resources Department for their questions related to the implementation of this Policy.

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[28] https://www.arcelikglobal.com/media/6236/15_global-human-rights-policy-en-1.pdf

[29] https://www.arcelikglobal.com/media/5510/1_global-code-of-conduct_.pdf

[30] https://www.arcelikglobal.com/media/5512/2_global-code-of-conduct-operations-policy_.pdf

[31] https://www.arcelikglobal.com/media/5515/3_global-whistleblowing-policy_.pdf

GLOBAL COMMUNITY INVESTMENT POLICY

1. PURPOSE AND SCOPE

The purpose of this Community Investment Policy ("**the Policy**") is to put forward the principles to adopt while developing community investment initiatives. Arçelik and its Group Companies recognize the impact of its operations on its stakeholders, the environment, and community at large and emphasizes significance of sustainable development.

This Policy, which is an integral part of the Koç Group Code of Ethics[32] and Arçelik Global Code of Conduct, is developed to demonstrate Arçelik and its Group Companies' commitment to making a positive impact on the welfare and sustainable development of related communities and the environment engaged with as a corporate citizen.

Arçelik and its Group Companies are committed to conducting business in conformity with the highest ethical standards. As a signatory to the UN Global Compact[33], Koç Holding A.Ş. complies with with UN Global Compact's 10 Principles. As a globally acting Koç Group company, Arçelik and its Group Companies also comply with those Principles.

This Policy is a reflection of Koç Holding's sustainability approach: "Lead. Together", as well as Koç Group Sustainability Guide. [34]

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."

"Group Companies" mean the entities of which Arçelik holds directly or indirectly more than 50% of share capital.

"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 latest consolidated financial report.

"The Sustainable Development Goals" 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.[35]

"The UN" means the United Nations.

"The UN Global Compact" [36] 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.

[32] Please refer to Koç Group Code of Ethics for details.
[33] https://www.unglobalcompact.org/what-is-gc/mission/principles
[34] https://www.koc.com.tr/sustainability
[35] https://www.un.org/sustainabledevelopment/sustainable-development-goals/
[36] https://www.unglobalcompact.org/what-is-gc/mission/principles

3. GENERAL PRINCIPLES

"Due Diligence"[37] is conducted on organizations or individuals that are supported by Arçelik or its Group Companies, in order to ensure that Community Investments are met by the reliable parties with sound purposes.

Arçelik and its Group Companies ensure that Community Investments, including those with organizations or individuals, abide by Koç Group Code of Ethics, Arçelik Global Code of Conduct, Global Human Rights Policy, Global Donations and Sponsorship Policy, Global Anti-Bribery and Corruption Policy and other relevant policies.

Applying to memberships of the regional, national, or international organizations, or being signatory to agreements related to Community Investments require ensuring compliance with the UN Global Compact Principles as it may affect Koç Group's and Arçelik and its Group Companies' reputation.

4. APPLICATION OF THE POLICY

While making Community Investments, in line with Koç Group Sustainability Guide[38], Arçelik and its Group Companies consider the following:

- whether the relevant Community Investment is compatible with the priorities and needs of the regions where Arçelik and its Group Companies' business activities are carried out,
- Providing a clear connection between Community Investment activities and business strategy,
- Establishing strong partnerships with civil society organizations, international organizations, universities or individuals in order to put forward applicable solutions,
- Ensuring that the objectives and results of the Community Investments are measurable and scalable by design, and the results have the potential to be disseminated across other businesses and regions, and
- Ensuring that they are aligned with the social and environmental goals, as mentioned in the UN Sustainable Development Goals.

5. AUTHORITY AND RESPONSIBILITIES

This Policy is to provide guidance in developing Community Investment initiatives for all employees, directors and officers of Arçelik and its Group Companies. If you notice any action you believe to be inconsistent with this Policy, you are required to seek guidance from Arçelik Sustainability Management and Corporate Brand and Projects, Management under Strategic Communications Group Management, the responsible functions.

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[37] Please refer to the Global Sanctions and Export Controls Policy
[38] https://www.koc.com.tr/sustainability.