

**IC GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş.**  
**ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

As IC Gayrimenkul Yatırım Ortaklığı A.Ş. (IC GYO), in all regions we operate, we under no circumstances tolerate bribery, corruption or abuse of authority by officials for the purpose of direct or indirect gain of any kind, regardless of our purpose.

As all IC GYO employees and managers, we are obliged to implement and enforce all requirements within the scope of anti-bribery and anti-corruption firstly by complying with all the procedures and controls in terms of our duties and responsibilities, and then sharing them with external stakeholders.

As IC GYO, with this Anti-Bribery and Anti-Corruption Policy, we adopt the principles below as a general framework.

- IC GYO employees can submit their personal information and notifications for unethical situations that they witness or suspect, especially regarding bribery and corruption, through the IC Synergy system in a way that only the Ethics Officer can see. Employees who wish to make their notifications anonymously without sharing any personal information can also submit their notifications exclusively to the Ethics Officer by selecting the IC Holding Ethics Hotline in the communication form under the communication tab on the IC Holding corporate website. External stakeholders, on the other hand, can make anonymous notifications on relevant issues as described on the corporate website, again without the obligation to disclose their identities.
- Since the main risk areas where situations such as bribery and corruption may occur are gifts and hospitality, sponsorships and donations, conflicts of interest and facilitation payments, IC Holding Code of Conduct and Ethics should be followed in these areas:

**o Gifts and Hospitality:** Any gifts given or received by IC GYO to third parties must be offered or accepted in good faith and without condition of benefit. These gifts should be symbolic in nature, within the amount ranges specified in IC Holding Code of Conduct and Ethics, not of high value and not exchanged frequently. IC Holding Code of Conduct and Ethics shall also apply to all kinds of hospitality activities offered to IC GYO by third parties.

**o Sponsorships and Donations:** IC GYO shall provide sponsorships or make donations where determined to be legal and ethical. IC GYO shall not make payments or provide aid to support any political organization or person. IC GYO acts within the scope of the publicly disclosed IC GYO Donation and Aid Policy regarding donations and aid.

**o Conflicts of Interest:** IC GYO employees at all levels shall refrain from self-interestoriented activities such as establishing a business relationship with relatives or friends, abuse of office, and taking part in jobs outside the organization that may result in a conflict of interest with the organization.

**o Facilitation Payments:** IC GYO does not tolerate facilitation payments offered to secure or expedite a routine transaction or process. Likewise, employees and business partners are not allowed to make facilitation payments on behalf of IC GYO.

- This policy has been announced through all existing communication channels of IC GYO, is easily accessible on the company's corporate website. Training programs are organized to increase the comprehensibility of the policy by stakeholders.

All activities carried out within IC GYO are enlisted in the accounting records in accordance with the provisions of the applicable legislation and the relevant principles and standards, and all such records and documents are clearly presented in the audits conducted by independent audit companies.

### **Objective of the Policy**

This policy aims to set out the principles and rules to be applied in combatting bribery and corruption for all relevant stakeholders, especially our employees.

### **Scope of the Policy**

This policy covers all IC GYO employees, including IC GYO Board of Directors, all suppliers and their sub-suppliers, customers, consultants, lawyers, auditors and all other persons and organizations working on behalf of IC GYO.

### **Implementation of the Policy and Relevant Legislation**

This policy was formulated by concretizing and regulating the rules set forth by the legislation and similar regulations in force relevant to our company's practices. In case of any incompatibility between the applicable legislation and this policy, IC GYO accepts that the applicable legislation will prevail.

### **Enforcement of the Policy**

This policy is reviewed periodically and updated when deemed necessary. Corporate Governance Committee is responsible for updating the policy.

This Policy and any changes made to it shall enter into force on the date of approval by the Board of Directors.