

NORM Holding Donation and Aid Policy

1. Objective and Scope

- 1.1 The donation and Aid Policy has been established to determine the standards, principles, and rules that must be followed in donation and aid transactions in NORM Holding and its subsidiaries.
- 1.2 With the belief that it is our responsibility to contribute to society, the environment, and our country, NORM Holding carries out donation and aid activities in the regions where it operates and throughout our country.

2. NORM Holding Donation and Aid Approach

- 2.1 The Donation and Aid Policy has been established in accordance with NORM Holding's Code of Ethics and related policies.
- 2.2 NORM Holding may give donations and aid to foundations and associations carrying out social responsibility projects, non-governmental organizations, social assistance institutions and organizations, clubs, and associations carrying out sports activities, educational institutions, and organizations.
- 2.2 Donations and aid may not be used to gain an undue advantage or used for any form of corruption.
- 2.3 Donations and aids may not be linked to any commercial opportunity.
- 2.4 Donations and aids must not be intended to benefit any politician, political party, municipality, or government official, directly or indirectly through a third party for political purposes. However, donations can be made to transparent social responsibility projects of municipalities, provided that it is for the environment, people's comfort, and/or welfare.
- 2.5 Donations and aids cannot be made for the benefit of any institution or organization that discriminates on the basis of ethnic origin, nationality, gender, religion, race, sexual orientation, age, or disability.
- 2.6 Donations and aids cannot directly or indirectly aim to violate human or animal rights, promote tobacco, alcohol, and illegal drugs, and harm the environment.

3. NORM Holding Donation and Aid Document Layout

- 3.1 It is possible to deduct material and in-kind donations from Norm Holding resources from corporate income in accordance with regulations.
- 3.2 Donations and aids limited to 5% of corporate income;
 - 3.2.1 Up to %5 of the annual corporate income of the company in total donations and aids made to public administrations with general and special budgets, special provincial administrations, municipalities and villages, tax-exempt foundations, associations working for public benefit, and institutions and organizations engaged in scientific research and development can be deducted from the corporate income in return for a receipt, provided that the amount is shown separately in the Corporate Tax Return.
 - 3.2.2 In order to be deducted from the tax base, donations and aids must be made to public administrations with general and special budgets, special provincial administrations, municipalities and villages, foundations granted tax exemption by the Council of Ministers, associations working for public benefit, and institutions and organizations engaged in scientific research and development activities.
 - 3.2.3 In order to be deducted from the tax base, donations and aids must be in return for a receipt.
 - 3.2.4 In order for it to be deducted from the tax base, donations and aids must be made unreciprocated.
 - 3.2.5 In order to be deducted from the tax base, donations and aids should only be deducted from the income of the relevant period.
 - 3.2.6 In order to be deducted from the tax base, donations and aids must be shown separately in the tax return.
 - 3.2.7 The portion that cannot be deducted from the corporate income cannot be transferred to another year. The amount of donations and aid that can be deducted in the determination of the corporate tax base is limited to 5% of the corporate income of that year.
 - 3.2.8 The basis for determining the amount of donations and aid that can be deducted is the amount before the deductions and exemptions are deducted, after deducting the corporate income, expenses including loss deduction, and participation earnings exception.

[Trade balance sheet profit – (exemption of subsidiary gains + retained year losses)]

3.3 Donations and Aids Regarding Education and Health Facilities (Kvk 10/1/Ç)

3.3.1 Expenditures made to develop and maintain education, health, and care services can be considered as a deduction factor in the determination of corporate income.

3.3.2 School, health facility, student dormitory, kindergarten, orphanage, nursing home, care, and rehabilitation center with a capacity of not less than 100 beds (fifty beds in priority areas for development) donated to public administrations with general and special budgets, special provincial administrations, municipalities and villages and places of worship to be built subject to the permission and supervision of the local authorities, facilities where non-formal religious education is given under the supervision of the Directorate of Religious Affairs, youth centers belonging to the Ministry of Youth and Sports, and 100% of the expenditures made for the construction of youth and scouting will be subject to deduction in the determination of the corporate tax base.

3.3.3 100% of all donations and aid made to the above-mentioned public institutions for the construction of the said facilities will be subject to deduction in the determination of the corporate tax base.

3.3.4 100% of the cash and in-kind donations and aids made for the said facilities to continue their activities will be subject to deduction in the determination of the corporate tax base.

3.3.5 For the construction of the mentioned facilities, donations and aid made to publicly beneficial associations other than the organizations listed in the paragraph and to foundations granted tax exemption by the Council of Ministers can be subject to a discount, limited to 5% of the corporate income of that year.

3.4 Donations and Aids for Cultural and Tourism Purposes

3.4.1 Within the scope of Corporate Tax Law 10/1-d, 100% of donations and aids made against a receipt can be deducted from corporate income.

3.5 Donations and Aids related to Natural Disasters

3.5.1 As decided by the Council of Ministers, 100% of the in-kind and cash donations made for natural disasters in return for receipt through the

Prime Ministry will be subject to deduction in the determination of the corporate tax base.

3.6 Donations and Aids related to the Turkish Red Crescent

- 3.6.1 Except for the economic enterprises, 100% of the cash donations or aid made to the Turkish Red Crescent Association in return for a receipt can be deducted from the corporate income.
- 3.7 Document Layout of Donations and Aids Allowed to be Deducted from Corporate Earnings
- 3.7.1 In order for donations and aids in kind or in cash to be considered as a deduction by corporate taxpayers, they must be made in return for a receipt.
- 3.7.2 Within the framework of some national donation and aid campaigns, it is observed that receipts cannot be obtained from time to time from the institutions to which donations and aid are made. In such cases, bank receipts showing that money has been deposited into accounts opened in banks for these purposes will be sufficient for documentation.
- 3.8 Value of In-kind Donations Donated by Withdrawing from Corporate Stocks or Assets
- 3.8.1 In case the donation or aid in kind is donated by withdrawing from the assets or stock of the enterprise, it is sufficient that an annotation is placed on the back of the invoice for the values that taxpayers withdraw from the enterprise and donate, and that the values specified in the invoice are received as donations or aid by the relevant public institution or organization, and signed and stamped by the authorized persons of the organization to which the donation is made.
- 3.8.2 On the other hand, if it can be obtained, it is beneficial to get a receipt.
- 3.9 Value of In-kind Donations Purchased from Outside
- 3.9.1 If the in-kind values are donated to public institutions and organizations by the taxpayers, it is sufficient to issue a document (goods receipt) regarding the delivery of the values to be received by these institutions and organizations, and the value, type, and amount of the donated asset should be stated in a way that leaves no room for doubt. In addition, on the back of the invoices issued regarding the donated values, there will be the signatures of the officials of the relevant public institutions and organizations within the above-mentioned explanations and the necessary stamps.
- 3.9.2 On the invoices to be issued based on donations within the scope of a partial exemption, the phrase "Exemption from VAT as per article

17/2-b of the VAT Law" should be placed.

4. NORM Holding Donation and Aid Procedure

- 4.1 Donations and aids can be determined by request or by the NORM Holding Board of Directors or NORM Holding Executive Board.
- 4.2 Donations and aid requests are reviewed by the NORM Holding Executive Board or the review team it will appoint.
- 4.3 If the result of the review is positive, the request is decided by the NORM Holding Executive Board and submitted for the approval of the Board of Directors.
- 4.4 Depending on the content of the donation and aid request, NORM Holding's related management units are informed and their opinions are taken.
- 4.5 Depending on the subject of donations and aid, the opinion of a lawyer is taken to sign a contract that includes all the conditions of the transaction.
- 4.6 Supporting documents such as receipts and invoices of donations and aids are kept by the Financial Affairs Department. Transactions performed are recorded in accordance with the relevant legislation.
- 4.7 All documentation regarding the review, approval, implementation, and follow-up processes of donations and aids is archived by the Accounting departments to be used when necessary for audit and compliance review.

5 Enforcement and Implementation

- 5.1 This regulation and related amendments come into force with the decision of the Norm Holding Board of Directors. It is presented for the approval of the shareholders at the General Assembly.
- 5.2 Norm Holding Board of Directors, primarily the Corporate Governance Committee, is responsible for the enforcement of this regulation.