

SİNPAŞ GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş.

ETHICS, BUSINESS CONDUCT AND COMPLIANCE POLICY

As Sinpaş GYO, we position our ethical values not merely as a governance principle, but as a fundamental building block of long-term value creation and our sustainable growth strategy. Our business model, shaped in line with the principles of fairness, transparency, responsibility and accountability, reflects a holistic ethical approach integrated into all our decision-making processes, operations and stakeholder relations. Our Company does not limit its approach to ethical matters solely to legal requirements; it places this area at the center of its corporate culture and strategic management approach. In this regard, our ethical leadership approach plays a critical role in the effective management of risks, the proper assessment of opportunities and the creation of sustainable value for all stakeholders. In conducting our activities, we integrate into our business model the governance, risk and opportunity management principles set out under the Türkiye Sustainability Reporting Standards (TSRS – Türkiye Sustainability Reporting Standards); and we take international practices as guidance, particularly the Global Reporting Initiative Standards (GRI – Global Reporting Initiative Sustainability Reporting Standards) and the London Stock Exchange Group (LSEG – London Stock Exchange Group Refinitiv ESG Data & Ratings) assessment frameworks. In line with the double materiality approach, our Policy adopts an integrated management approach in which financial performance and environmental and social impacts are evaluated together. Within this scope, our ethical principles extend across our entire value chain, are monitored through measurable performance indicators and are supported by regular audit processes. Through its ethical leadership approach, Sinpaş GYO commits to establishing a trust-based, transparent and sustainable business model that responds not only to today's investor expectations but also to those of the future. As a strong reflection of our Company's corporate identity, this Policy provides a binding framework for all our employees, board members and business partners.

1. Integrity, Transparency and Ethical Conduct (Integrity, Transparency & Business Ethics)

- ✓ The Company bases all its business relationships and communications on fairness, transparency and accountability. In financial and sustainability reporting, we provide complete, comparable, verifiable and timely information in accordance with the requirements of TSRS 1.
- ✓ To prevent conflicts of interest, the board of directors and employees submit annual declarations; potential conflicts are transparently recorded and managed.
- ✓ Values, principles, standards and norms of conduct are clearly defined in all policies and procedures; they are published on the website, Sinpaş Portal and through internal training, the necessary documents are shared during HR orientation training, and detailed face-to-face presentations are provided.
- ✓ Mechanisms concerning ethical violations (whistleblowing) are anonymous and non-retaliatory, and detailed information on the relevant system and process management is provided in the "Ethics Hotline" section. The board of directors approves the ethics policy and reviews it at specified intervals.

2. Fair Business and Competition Practices (Fair Business Practices & Anti-Competitive Behavior)

- ✓ We promote fair competition and fully comply with competition rules (anti-trust, monopoly). Price fixing, market sharing or other anti-competitive conduct is strictly prohibited.
- ✓ We act impartially, fairly and equally toward customers, suppliers, employees and stakeholders.
- ✓ Ethical criteria (sustainability, human rights) are prioritized in supply chain management.
- ✓ All lobbying activities relating to public policies are conducted in line with the principles of transparency and accountability; where applicable, political contributions and any impacts that may arise within this scope are disclosed to the public openly, accurately and in a timely manner in accordance with the relevant legislation and international practices.

3. Privacy, Data Protection and Customer Responsibility (Privacy, Data Protection & Product Responsibility)

- ✓ We protect the personal data of customers, employees, suppliers and stakeholders in compliance with KVKK and GDPR. Information security systems (cyber security) are continuously improved.
- ✓ Sensitive information is protected against unauthorized access; data breaches are reported immediately and measures are taken.
- ✓ We comply with the principles of customer health, safety and responsible marketing in products/services.

4. Conflicts of Interest and Gifts/Hospitality (Conflicts of Interest & Gifts/Hospitality)

- ✓ Personal interests may not take precedence over the interests of the Company. All potential conflicts of interest are recorded, assessed and prevented.
- ✓ The gifts and hospitality policy is strict in order to minimize corruption risk: Gifts exceeding a specified value may not be accepted/given; all gifts are recorded and transparently audited.
- ✓ The Policy is aligned with the principles of the OECD Anti-Bribery Convention and the UN Global Compact.
- ✓ Employee employment contracts include a “Prohibition on Gifts” clause, and the relevant clause provides detailed information regarding the process. The relevant section principally provides that: employees and their immediate family members/relatives are prohibited from receiving any gratuitous goods and services, including gifts, from customers and suppliers of the Company and its subsidiaries, in excess of USD 10 on any single occasion and USD 20 in total within one year. Gifts that cannot be returned must be delivered under record to the Corporate Administrative Affairs unit.

5. Anti-Bribery and Anti-Corruption (Anti-Bribery & Anti-Corruption)

- ✓ Bribery, corruption, facilitation payments, fraud, extortion, collusion and money laundering are strictly unacceptable.
- ✓ Risk assessment: All of our operations (and the value chain) are regularly assessed for corruption risks. Additional controls are applied for high-risk regions/business partners.
- ✓ Training and communication: Anti-corruption policies and procedures are regularly communicated to all employees and relevant business partners (including suppliers), and training is provided. Training participation and effectiveness are measured.
- ✓ Violation management: Confirmed corruption cases are investigated immediately, disciplinary/legal action is taken, and necessary disclosures are made. The number of violations and actions taken are transparently stated in annual reports.
- ✓ Awareness: Employees may safely report their concerns through the whistleblowing “ethics hotline” mechanism; protection against retaliation is provided.

6. Environmental Responsibility and Sustainability (Environmental Responsibility)

- ✓ We conduct our activities with respect for the environment and use natural resources efficiently. We manage climate-related risks and opportunities (physical and transition risks) in accordance with TSRS 2, conduct scenario analyses and report Scope 1-2-3 GHG emissions.
- ✓ We set continuous improvement objectives for environmental protection, biodiversity, waste management, and water and energy efficiency, and monitor our performance through KPIs.
- ✓ Supplier environmental assessments are conducted; sustainability criteria are integrated into contracts.

7. Social and Community Responsibility (Social & Community Responsibility – Community/Human Rights)

- ✓ With a sense of responsibility toward society, we support social responsibility projects, create social benefit and contribute to sustainable development.
- ✓ Human rights: In our activities and value chain, we comply with fundamental human rights conventions (ILO, UN Guiding Principles). Child labor, forced labor, discrimination and harassment are strictly prohibited.
- ✓ Diversity, equity and inclusion (DEI = D (Diversity): Diversity – E (Equity): Equity (or Equal Opportunity) – I (Inclusion): Inclusion) are encouraged; mobbing, discrimination and all forms of harassment are not tolerated.

8. Good Workplace Practices and Employee Rights (Workplace Practices & Labour Relations – Workforce & Health & Safety)

- ✓ We promote respect, fairness, equality and cooperation in the workplace. Freedom of association and the right to collective bargaining are recognized.
- ✓ Occupational health and safety (OHS): We comply with legal regulations, conduct risk assessments and prioritize employee health. Training, awareness and performance monitoring are carried out.
- ✓ Employee development, fair remuneration and career opportunities are provided.

9. Audit, Risk Management and Continuous Improvement (Compliance, Assurance & Governance)

- ✓ Implementation of the Policy and control of the process are continuously monitored through audits by the Internal Audit Unit, including oversight involving the board of directors. Internal audit and control systems are regularly reviewed and strengthened; independent assurance is provided through the activities carried out within this scope.
- ✓ Internal audit activities conducted through the “Ethics Hotline”, feedback processes, and corrective/improvement actions taken regarding ethical violations are reported to the board of directors at specified intervals, included in internal audit activity reports and monitored systematically. In addition, sustainability risks (including climate) are proactively identified, managed and reported by the sustainability committee.
- ✓ Within the scope of internal audit activity reports and follow-up work, risk management and annual performance measurement are carried out, KPIs are set for future periods, and the scope and metrics of assessment are regularly updated.
- ✓ Supplier and business partner compliance: Ethical, environmental and social criteria are added to contracts; audits are conducted.
- ✓ The Policy is reviewed and improved annually to ensure full alignment with GRI, TSRS and Refinitiv criteria.

Implementation and Responsibilities

- ✓ Board of Directors: Policy approval, strategic oversight.
- ✓ Ethics Committee: Policy, process assessment and ethical oversight.
- ✓ Internal Audit Unit: Continuous improvement, audit, control, investigation and reporting.
- ✓ All Employees and Business Partners: Commitment to and compliance with the Policy.
- ✓ In the event of a violation: Disciplinary procedure, legal action and transparent disclosure are applied.

While reinforcing Sinpaş GYO’s ethical leadership approach and sustainability-focused corporate governance approach, this Policy forms the foundation of a transparent and accountable governance model aligned with international practices. Within this framework, our Company commits to continuously improving its ethical performance and maintaining open, trust-based communication with all stakeholders. The Policy is made available to the public through the Company website and sustainability reports.

This Policy has been in force since 2025 and will be updated regularly.

For any questions or additional details, you may contact the Internal Audit Unit.

Ethics Hotline

All notifications and processes submitted by personnel, customers, suppliers and stakeholders are actively monitored, and necessary actions are taken.

What Do We Report to the Ethics Hotline?

- ✓ Transactions contrary to applicable laws and regulations
- ✓ Irregularities, corruption, bribery and conflicts of interest
- ✓ Discrimination, mobbing, harassment or unethical conduct in the workplace
- ✓ Privacy breaches and information security vulnerabilities
- ✓ Any acts contrary to the Sinpaş Group Code of Conduct

Reporting Methods

- ✓ Reports may be submitted without providing a name.
- ✓ The ethics hotline is activated even without disclosure of identity.
- ✓ Employees who wish may provide their name and contact information.
- ✓ In such cases, the Ethics Hotline manages the process while preserving confidentiality.
- ✓ Protecting the employee is a priority for the institution.

Prepared by: Sustainability Committee / Internal Audit Department

Approved by: Board of Directors

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Ethics Hotline / Whistleblowing Hotline / Ethics & Compliance Hotline

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