

► **TÜRK TELEKOM**  
**2023 ANNUAL REPORT**

## Corporate Governance Compliance Report

### Statement of Compliance with Corporate Governance Principles

Türk Telekomünikasyon A.Ş. (“Türk Telekom”) pays utmost attention to implementing the Corporate Governance Principles published by the Capital Markets Board of Türkiye (“CMB”). The Company updates its annual and interim activity reports and corporate website, and makes them available to its shareholders within the framework of the said principles. Shareholders have access to comprehensive information through the Türk Telekom Investor Relations website, which is constantly kept up-to-date, and may also direct their queries to the Investor Relations and Sustainability Department.

On 14 December 2023, the corporate governance rating assessment report of Türk Telekom was prepared by SAHA Kurumsal Yönetim ve Kredi Derecelendirme Hizmetleri A.Ş. (SAHA), which holds an operating license to perform rating assessment in Türkiye in line with the CMB Corporate Governance Principles.

The Company received an overall average rating of 9.40 as a result of a corporate governance rating assessment. The Company’s Corporate Governance rating was determined with the assessment carried out under four main categories (Shareholders, Public Disclosure and Transparency, Stakeholders, Board of Directors) with weightings assigned within the framework of the CMB’s Corporate Governance principles.

The breakdown of corporate governance rating under these major categories was as follows:

<b>Subcategories</b>	<b>Weight</b>	<b>Rating</b>
Shareholders	25%	87.47
Public Disclosure & Transparency	25%	98.85
Stakeholders	15%	99.51
Board of Directors	35%	92.92
<b>Total</b>	<b>100%</b>	<b>94.03</b>

The rating of 9.40 assigned by SAHA based on the Corporate Governance Principles is a clear indicator that the Company is largely compliant with the CMB Corporate Governance Principles and has brought the necessary policies and measures into effect. The Company will maintain its efforts to fully comply with the Principles of Corporate Governance.

#### **Reasons for non-compliance with certain Corporate Governance Principles**

Pursuant to the Communiqué No: II-17.1 dated January 3, 2014 of the Capital Markets Board on the Corporate Governance, and relevant regulations, the non-complied issues and their grounds are listed below. No conflict of interest has occurred to date due to the principles that are not complied.

#### **Presence of voting privileges of shareholders**

The privileges attached to the Golden Share held by the Ministry of Treasury and Finance of the Republic of Türkiye are statutory (the law numbered 4673), and the Company is not authorised to amend these privileges.

**Mechanisms and models to encourage the participation of stakeholders, particularly Company employees, in the management of the Company are not regulated by the Articles of Association or the Company's internal regulations**

Models for the participation of the Company's employees in the management have not been included in the Articles of Association; however, such models have been developed and put into practice within the Company's internal directives. The Company's organisational structure is formed by the Board of Directors, the committees established at the Board of Directors and senior management level, senior management and directorates affiliated to the senior management. All levels are in effective and close communication. Moreover, models for the participation of the Company's employees in the management, such as the Occupational Health and Safety Boards, Disciplinary Boards, the Disputes Resolution Board, Inventors' Idea System and the DNA (What Does Your Experience Tell Me?) are developed.

**Non-Presence of articles in the Articles of Association to extend minority rights to shareholders, which hold less than one twentieth of the capital**

The Articles of Association of the Company was prepared taking into account the ratio determined by the Turkish Commercial Code in relation to minority rights.

**Each member of the Board of Directors' participation is not limited to one committee**

Due to the number of independent members of the Board of Directors of the Company, some Independent members of the Board of Directors are assigned in more than one committee.

**No performance assessment of Board of Directors has been conducted to evaluate whether the Board of Directors have fulfilled their responsibilities effectively**

No assessment has yet been carried out as of the publication date of the Annual Report.

## **SHAREHOLDERS AND STAKEHOLDERS**

### **Investor Relations**

At Türk Telekom, the activities with respect to regular management of relationships with existing and potential shareholders and fixed income investors, responding efficiently to queries from investors and analysts, and activities targeted at increasing the value of the Company are carried out by Investor Relations and Sustainability Department ("the Department") which reports to Assistant General Manager of Finance (CFO).

Execution of the responsibility arising from capital markets legislation and coordination of corporate governance practices is supervised by the Director of Investor Relations and Sustainability, Gülsen Ayaz, who holds Capital Market Activities Level 3 and Corporate Governance Rating licenses, and is also responsible for the management of Investor Relations activities.

The primary activities handled by the Department are as follows:

- Including all kinds of cases related to Corporate Governance and Public Disclosure, performing the requirements of the Capital Market Regulations, and

handling necessary internal and external disclosures and monitoring related processes,

- Introducing and presenting the Türk Telekom Group to domestic and foreign; individual and institutional, equity and fixed income investors,
- Keeping existing and potential equity investors and fixed income investors regularly informed of the Company's activities, financial standing and strategies in a simultaneous, equal, accurate and complete manner,
- To ensure that records related to correspondences between investors and the Company and other information and documents are maintained in a manner that is sound, reliable and up-to-date,
- Responding to written information requests from equity and fixed income investors related to the Company,
- Preparing documents required for submission for shareholders' review with regard to the General Assembly meeting, and taking precautions to ensure the organisation of the General Assembly meeting in accordance with related regulation, the Articles of Association and other regulations within the corporation,
- Responding to requests for information from research analysts; ensuring the Company is presented in the best way and providing necessary information to make sure that reports for investors are prepared in an accurate and complete fashion,
- Sharing the interim and year-end statements, investor presentations, press releases and annual and interim activity reports regarding financial and operational results with investors and the press; and updating the Investor Relations website regularly to ensure that shareholders have access to accurate and complete information,
- Execution of the Company's Sustainability policies, strategies and targets, implementation of decisions and recommendations taken by the Board of Directors upon recommendation, monitoring and reporting to the Sustainability Committee on the progress of projects and studies planned to be handled within the scope of the Sustainability program, ensuring the coordination of the functioning of the Sustainability Committee,
- Developing Türk Telekom's sustainability vision and initiatives, establishing effective sustainability approaches for investors and all other stakeholders, and realising the reporting in this area in a systematic framework,
- Ensuring that the reporting required for the rating processes of the sustainability indices and independent assessment institutions are timely and reflect the Company's current status accurately, thus improving the Company's Environmental, Social and Corporate Governance (ESG) reporting activities,
- Keeping investors regularly informed about Türk Telekom and the developments in Turkish Capital Markets by participating in conferences and investor meetings,

- Monitoring public disclosures that are carried out pursuant to the Company's Disclosure Policy and applicable legislation,
- Sharing stock related information within the Company, by monitoring the composition of domestic/foreign investors and significant changes in trading volume of Türk Telekom shares which are traded on the Borsa Istanbul.

For questions related to dividends and voting at the General Assembly, please contact the Corporate Governance and Compliance Group Manager, Eren Öner via [investorrelations@turktelekom.com.tr](mailto:investorrelations@turktelekom.com.tr) e-mail address.

The Department received over a thousand requests for information by telephone and email during 2023 and all these inquiries were responded.

In 2023, Türk Telekom held meetings with 176 equity and bond investors from different geographies and considers providing timely, continuous and accurate information to its investors among its top priorities. Türk Telekom Investor Relations participated in investor conferences and webinars, and organised roadshows in 2023. Türk Telekom Investor Relations continued to organize teleconferences throughout the year, following the announcement of quarterly financial and operational results, for the Company's senior management to share their assessments for the relevant quarter and for investors and analysts to ask questions to the management.

Paying utmost attention to the implementation of the principles set out in the Corporate Governance Principles published by the Capital Markets Board, Türk Telekom protects the interests of all shareholders and stakeholders equally in a transparent and close relationship. Türk Telekom Investor Relations and Sustainability Director continues serving as a member of the Company's Corporate Governance Committee.

#### **Employees of Investor Relations and Sustainability Department**

<b>Name and Last Name</b>	<b>Job Title</b>
Gülsen Ayaz	Director
Eren Öner	Group Manager
Gaye Yalçın	Manager
Furkan Ceylan	Manager
Hazal Koçoğlu	Associate
Ömer Abdurrahman Demircan	Associate
Başak Erik Kızıldoğan	Associate
Simay Baş	Assistant Associate

Phone: +90 212 309 96 30

E-mail: [investorrelations@turktelekom.com.tr](mailto:investorrelations@turktelekom.com.tr)

#### **Use of Shareholders' and Stakeholders' Right to Obtain Information**

Within the framework of the Turkish Commercial Code No. 6102, queries other than those relating to trade secrets and undisclosed information received from shareholders and analysts by the Investor Relations and Sustainability Department by letter, telephone, email or other means are answered in the fastest and most effective way

possible upon contacting the relevant person with the highest authority on the related matter. More than a thousand information requests were answered by Türk Telekom in the relevant period. Furthermore, information and developments related to Türk Telekom, which may be of concern to the shareholders, are published both in Turkish and English, and both in current form and retrospectively in order to ensure shareholders' exercise of their right to obtain information and quick and easy access to information through the Investor Relations website. They are also regularly communicated to those registered on the database through email.

The [www.ttyatirimciiliskileri.com](http://www.ttyatirimciiliskileri.com) website with the relevant documents is periodically updated in accordance with the legislative requirements.

Further details related to the use of the shareholders' right to obtain information are presented under the heading of the "Corporate Investor Relations Website and its Content" that can be found below.

Company activities are periodically audited by independent auditors appointed by the General Assembly upon proposal by the Board of Directors. Independent audit services for the activities conducted in 2023 were provided by Güney Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. (Ernst & Young).

There is no article related to the appointment of a special auditor in the Articles of Association. There was no request for the appointment of a special auditor in 2023 and no special audit was conducted. On the other hand, the Company is subject to the audit of numerous independent administrative authorities, primarily ICTA. The results of inquiries and audits are disclosed to the public in the context of disclosure of material events regulated by the Communiqué on Material Events Disclosure.

Minority shareholders' rights regarding the appointment of a special auditor are regulated in the Articles 438 and 439 of the New Turkish Commercial Code 6102.

### **General Assembly Meetings**

The arrangements regarding the General Assembly Meetings of the Company, is in the Articles of Association of Türk Telekomünikasyon A.Ş., which is publicly available on the Investor Relations website of the Company.

Articles of Association: <https://www.ttyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/articles-of-association-trade-registry-information>

Pursuant to Article 18 of the Articles of Association, right holders who have right to join the General Assembly meetings of the Company may participate in these meetings electronically as well, in accordance with article 1527 of Turkish Commercial Code.

### **Ordinary General Assembly Meeting held in 2023**

On 9 August 2023, the Ordinary General Assembly Meeting convened at the address of Türk Telekomünikasyon A.Ş. Genel Müdürlük Kültür Merkezi, Turgut Özal Bulvarı, 06103 Aydınlıkevler, Ankara, where 89.1% of the Company shares were represented. During this meeting, shareholders and their proxies attending both electronically and individually exercised their right to ask questions and their questions were answered.

Minutes of the Meeting can be accessed from <https://www.ttyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/general->

[assembly-meeting](#) . No proposals for agenda items were tabled by shareholders during the meeting other than the sub-agenda Items.

Particulars related to the said Ordinary General Assembly Meeting dated 9 August 2023 were registered by Ankara Trade Registry Directorate on 11 August 2023, and were published in the Turkish Trade Registry Gazette dated 11 August 2023.

Furthermore, public disclosures announced by the Company regarding the General Assembly meeting was also published on the Public Disclosure Platform as of the date of the meeting. Press or stakeholders did not participate to the General Assembly Meetings.

According to Article 31 of the Company's Articles of Association, General Assembly Meetings are announced at least 21 days in advance of the meeting date, excluding the dates of announcement and meeting, in the Turkish Trade Registry Gazette and in two national newspapers in accordance with Article 29 of the CMB, so as to inform the shareholders in advance of the General Assembly Meetings.

Information on General Assembly Meetings, General Assembly agenda, letters of invitation, proxy sample forms and information note, which includes detailed information regarding agenda items are also posted on the Investor Relations website and the e-company portal of the Central Registry Agency.

Shareholders who wished to exercise their rights attached to their shareholding and who fulfilled the necessary procedures for participation in General Assembly Meetings pursuant to applicable legislation attended the General Assembly Meeting.

The announcement and explanations which the Company is required to disclose in accordance with the principles of corporate governance, the Information Set forth and the invitation to the General Assembly Meeting and the Minutes of the Meeting are made available for uninterrupted access to the shareholders on the website <https://www.ttyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/general-assembly-meeting> the e-company portal of the Central Registry Agency and the Public Disclosure Platform.

There were no transactions that required the positive vote of a majority of independent Board Members in order to be resolved by the Board of Directors, or which were left to the discretion of General Assembly due to the negative votes of independent Board Members.

The Donation Policy established in accordance with the Corporate Governance Principles has been updated and approved at the 2022 Ordinary General Assembly meeting.

According to donation policy; the donation amount to be made within the framework of the legislation and the Company policies in a fiscal year cannot exceed five per mille of the annual sales amount reported in the independently audited consolidated financial statements of the Company for the previous year. At the Ordinary General Assembly Meeting held on 9 August 2023, shareholders were informed about the total amount of donations and grants (TL 132,525,108) made by the Company to associations and foundations in the fields of education, health, sports, culture, arts and humanitarian aid in 2022. The total amount of donations and aids made in 2023 is TL 767,641,659.

As far as Company is aware, no shareholders holding management control, Board Members, insiders with administrative responsibilities or spouses and their relatives up to the second degree relation by blood or marriage were not engaged in any transaction that could cause a conflict of interest for the Company or its subsidiaries, or did not carry out any commercial transaction included in the operation of the Company and its subsidiaries on behalf of themselves or another individual, or did not join a partnership engaged in the same scope of activity in the capacity of a partner with unlimited liability. There was no General Assembly Meeting resolution that was not implemented in 2023.

The Company's Class A shares held by Türkiye Wealth Fund and Class C shares held by the Ministry of Treasury and Finance of the Republic of Türkiye are registered, whereas the remaining shares are bearer shares.

### **Voting and Minority Rights**

All shares of Türk Telekom can be transferred except for one privileged (golden) share of Group C. For the purpose of protecting the national interest in issues of national security and the economy, the following actions and resolutions cannot be taken without the affirmative vote of the holder of the C Group Privileged Share at either a meeting of the Board of Directors or the General Assembly. Otherwise, such transactions shall be deemed invalid.

- a) Any proposed amendments to the Articles of Association,
- b) The transfer of any registered Shares in the Company which would result in a change in the management control of the Company,
- c) The registration of any transfer of registered shares in the Company's shareholders' ledger.

Pursuant to the Articles of Association and the Telegram and Telephone Law numbered 406, the holder of the Group C Privileged Share appoints one member representing the Privileged Share to the Board of Directors of Türk Telekom. The Group C Privileged Share owner cannot participate in capital increases.

The Company's Articles of Association contain the provision that minority rights are to be exercised by shareholders representing at least 5% of the paid-in capital. However, minority shareholders are not represented on the Board of Directors.

There is no cross-ownership in the Company's share capital.

### **Dividend Right and Profit Distribution Policy**

The Articles of Association do not grant any privileges regarding participation in the Company's profit. Each share is entitled to an equal profit share; however, the holder of the Class C share does not receive any share from the profit. Türk Telekom dividends are paid within the legally prescribed periods of time as set out by the applicable legislation.

The Company adopts a policy of distributing the maximum amount of distributable profit in accordance with Articles 28, 29 and 30 of our Company's Articles of Association. The Dividend Distribution policy was approved by shareholders in the Ordinary General Assembly Meeting for 2013 convened on 27 May 2014. On the other

hand, the Board of Directors considers the short-term financial liabilities of group companies and the conditions of those contracts signed with creditors in determining the Company's dividend proposal.

As stated in the Company's Articles of Association, the dates and the manner of distribution of the annual profit to shareholders is decided by the General Assembly upon the proposal by the Board of Directors, in accordance with the provisions of the Capital Market Law and applicable legislation.

Company's Dividend Distribution Policy is disclosed to the public through Investor Relations website (<https://www.tyatirimciiliskileri.com.tr/media/awuc5ih0/dividend-policy.pdf>) and stated in Company's annual report.

It is resolved at our Company's Ordinary General Assembly Meeting for the year 2022 that;

1- The Company's net profit calculated according to the independently audited consolidated financial tables prepared in accordance with the provisions of "Capital Markets Board (CMB) Communiqué About Financial Reporting in Capital Markets No.II-14.1" is TL 4,134,846,000 for the fiscal year of 2022,

2- Pursuant to the CMB Communiqué on Dividends No: II-19.1, the profit after tax amount of TL 4,134,846,000 shall be the base amount for dividend distribution,

3- The Company is not required to take any reserves for 2022 as per the Article 519 of Turkish Commercial Code because it has already reached the general legal reserve limit,

4- Accordingly, subject to the provisions of its Articles of Association of our Company, that the net profit amounting to TL 4,134,846,000, which is based on the independently audited consolidated financial statements, shall be recorded as extraordinary reserves.

The Company did not buy back its shares in 2023.

### **Transfer of Shares**

The provisions of the Company's Articles of Association restricting transfer of shares are as follows:

Without prejudice to Article 6/A of the Company's Articles of Association, all shares of Türk Telekom can be transferred except for one privileged (golden) share of Group C. For the purpose of protecting the national interest in issues of national security and the economy, the following actions and resolutions cannot be taken without the affirmative vote of the holder of the C Group Privileged Share at either a meeting of the Board of Directors or the General Assembly. Otherwise, such transactions shall be deemed invalid:

- a) Any proposed amendments to the Articles of Association,
- b) The transfer of any registered shares in the Company which would result in a change in the management control of the Company,
- c) The registration of any transfer of registered shares in the Company's shareholders' ledger.

The transfer of shares are restricted until the expiration of the Strategic Commitment Period of 14 November 2008 as stipulated in Article 6.A.2 of the Articles of Association, which is as follows: “At any time after the later of the expiry of the Strategic Commitment Period and the date on which the holder of the Group A Shares has paid in full for all of its Shares in the Company, the holder of the Group A Shares may transfer some or all of its Shares to a third party, subject always to the veto rights of the holder of the C Group Privileged Share.” After the end of the aforementioned transfer restriction period, the transfer of the Company’s Group A shares is always subject to the veto rights of the holder of the Group C Privileged Share. The Strategic Commitment Period ended on 14 November 2008 and the holder of Group A shares paid the amount in full for all of their shares in the Company. Accordingly, the Company’s Group A shares may be transferred with the approval of the holder of the C Group Privileged Share. The Group A Shareholder may pledge, mortgage or charge those of its shares as shall from time to time not be subject to the Share Pledge to a financial institution for the purpose of security for borrowings incurred in respect of the purchase of such shares or otherwise. If that financial institution forecloses such a pledge, mortgage or charge then it may only transfer the Group A Shares subject to the pledge, mortgage or charge in the event that it obtains the prior written consent of the Treasury (such consent not to be unreasonably withheld).

According to Article 6.A.3 of the Company’s Articles of Association, the restriction placed on the transfer of shares of Group B shareholders is limited to the strategic commitment period and there shall be no restrictions on the transfer of Group B shares after the end of the strategic commitment period on 14 November 2008.

Furthermore, according to the supplemental Article 17 of the Telegram and Telephone Law numbered 406 and paragraph 4 of the Article 6 of the Company’s Articles of Association, the C Group Privileged Share shall not be sold.

## **PUBLIC DISCLOSURE AND TRANSPARENCY**

### **Company Disclosure Policy**

The Türk Telekom Disclosure Policy has been established in line with the CMB’s Communiqué on Principles Governing Disclosure of Material Events No: II-15.1 and CMB’s Corporate Governance Principles. In line with the decision taken by the Company’s Board of Directors, the policy was updated on 7 July 2021 and announced on the Public Disclosure Platform, and has been approved and brought into effect by the Board of Directors, with shareholders being informed during the Ordinary General Assembly Meeting convened on 31 March 2022; The Disclosure Policy is posted on the Investor Relations website

([https://www.ttyatirimciiliskileri.com.tr/media/zeoda5k5/disclosure\\_policy\\_2021.pdf](https://www.ttyatirimciiliskileri.com.tr/media/zeoda5k5/disclosure_policy_2021.pdf) ) under the Corporate Governance heading. The Investor Relations and Sustainability Department is responsible for the monitoring and development of the said policies, and the names and duties of those with the relevant responsibility are listed under the heading of the Investor Relations Unit. These individuals closely cooperate with the Board of Directors and Corporate Governance Committee in the fulfilment of these responsibilities.

## 2023 Company Guidance

The Company revised its guidance on 14 August 2023 following the first half financial reporting period, due to the operational and financial performance recorded above the expectations in the business lines in 2023. The revision made is as follow;

	Previous Guidance	Revised Guidance
<b>Consolidated Revenue Growth (exc. IFRIC 12)</b>	52-55%	67-70%
<b>Consolidated EBITDA</b>	TL 23-25 bn	TL 25-27 bn
<b>Consolidated CAPEX</b>	TL 17-19 bn	TL 19-21 bn

*Note: 2023 guidance expectations represent approximate values.*

## Realised performance in 2023<sup>8</sup>

While the consolidated revenue (excluding IFRIC 12) increased by 71% slightly higher than the Company's annual revenue growth guidance, the EBITDA recorded as TL 27.3 billion again surpassing the high-end of our guidance range which stood at TL 25-27 billion. During the same period, the Group invested in line with the consolidated CAPEX guidance as TL 21.6 billion slightly ahead of our FY guidance.

## Guidance for 2024 Consolidated Financial Results

Under current circumstances, guidance for 2024 is as below:

- Consolidated revenue growth (excluding IFRIC 12) to be around 11-13%
- Consolidated EBITDA Margin to be around 36-38%
- Consolidated CAPEX / Sales Revenue to be around 27-28%

*Note: 2024 guidance expectations represent approximate values.*

*Note: We assumed an inflation trajectory leading annual CPI to 42% by the end of 2024.*

## Investor Relations Website and its Content

The Investor Relations website can be accessed from [www.tinvestorrelations.com.tr](http://www.tinvestorrelations.com.tr) and is actively used in achieving transparency and public disclosure in parallel with Capital Market legislation, CMB and BIST rules and regulations and the CMB's Corporate Governance Principles. The information on the website is provided in both Turkish and English. The main headings covered on the website are listed below:

- Detailed information about the company profile
- Vision, mission and values
- Company management and shareholding structure

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<sup>8</sup> This section is based on unaudited financials prepared without TAS29 and is produced for the purpose of comparative assessment of the FY'23 performances to prior periods and/or Company guidance. Our Board of Directors and executive management responsible from financial reporting are accountable for the data presented in this section.

- Information about the Members of the Board of Directors and Senior Management of the Company
- Company's Articles of Association and the Turkish Trade Registry Gazette where the amendments are published
- Trade registry information
- Financial statements and activity reports
- Public disclosures of material events
- Earnings releases
- Investor presentations
- Stock performance information
- Bond information
- Credit ratings
- Contact information of analysts
- Information about the General Assembly Meetings
- Corporate Governance Principles compliance report
- Profit distribution policy, history and capital increases
- Disclosure Policy, Remuneration Policy, Women Membership in Board of Directors Policy, Human Rights Policy and other policies
- Business Ethic Codes
- Independent auditor information
- List of insiders with administrative responsibilities
- Internal Audit and Risk Management
- Information on committees established according to the Capital Markets Board Corporate Governance Principles
- Offering circular related to the public offering
- Türk Telekom Call Centre and contact information
- Investor Relations contact information
- Sustainability
- Information related to the social responsibility projects of Türk Telekom
- Frequently asked questions and answers
- Telecom glossary

## Trade Registry Information

Date of Registration	30 June 1994
Date of publishing the corporation in Turkish Trade Registry Gazette	1 July 1994
Registration Number	103633
Trade Registry Office	Ankara Trade Registry Office
Central Registration System Number	0876005220500084

## Disclosure of Ultimate Controlling Individuals

Not subject to the registered capital system, the Company has a share capital of TL 3,500,000,000 which is fully paid-in.

The distribution of the paid-in capital among the shareholders is as shown below:

Shareholders	Share in Capital		
	Amount (TL)	Group	Share (%)
Türkiye Wealth Fund	1,925,000,000.00	A	55
T.C. Hazine ve Maliye Bakanlığı	875,011,884.975	B	25
T.C. Hazine ve Maliye Bakanlığı	0.01	C	
Türkiye Wealth Fund	174,988,115.015	B	5
Free Float	525,000,000.00	D	15
<b>Toplam</b>	<b>3,500,000,000.00</b>		<b>100</b>

*Note: According to the Official Gazette which was published on 5 February 2017, the Council of Ministers decided to transfer the 6.68% stake (5% B Group shares and 1.68% D Group free float shares) of the Company belonging to Republic of Türkiye Ministry of Treasury and Finance to the Turkish Wealth Fund. The share transfer transaction was completed in 2017.*

## Other Information in Accordance with Legislation

The content of the annual activity report is prepared in accordance with the New Turkish Commercial Code and the regulations of the Capital Market Board. There were no conflicts of interest arising between Türk Telekom and the related organisations which offer investment advice, investment analysis and rating activities.

The Chief Executive Officer is not the Chairman of the Board of Directors.

No administrative sanction or penalty has been imposed on any member of the Board of Directors.

As there is no cross ownership in the Company's share capital, no information regarding this issue is provided in the activity report.

## **THE BOARD OF DIRECTORS**

### **Structure and Formation of the Board of Directors**

During the Extraordinary General Assembly Meeting of the Company held on January 25, 2019, Article 8 of the Articles of Association of the Company, entitled 'Board of Directors', was amended. The number of members of the Board of Directors was set at nine, and members of the Board of Directors were elected for a term of three years.

In accordance with the Company's Articles of Association, members of the Board of Directors may be nominated as follows;

a) The Group A Shareholder as all be entitled to nominate five (5) persons for election as Directors;

b) provided that the Treasury and Turkish Wealth Fund, as Group B Shareholders shall hold;

- 30% or more of the shares, the Treasury shall be entitled to nominate three (3) persons for election as independent board members who carry the independence criteria as defined in the Capital Market legislation or
- 15% or more of the shares (but less than 30% of the shares), the Treasury shall be entitled to nominate two (2) persons for election as independent board members who carry the independence criteria as defined in the Capital Markets legislation:
- During the calculation of 15% and 30% of the shares mentioned above paragraphs, the amount of Group B shares and Group D shares held by the Treasury and Turkish Wealth Fund shall be considered together.

c) As long as the Treasury and Turkish Wealth Fund holds 15% or more of the Shares (but less than 30% of the Shares), the Group A shareholder shall be entitled to nominate one (1) person, who carry the independence criteria as defined in the Capital Markets legislation, for election as independent Board members and five (5) persons for election as Director.

d) While the Treasury holds the Group C Privileged Share, the Treasury shall be entitled to nominate, a further one (1) person, for election as Director for the C Group Privileged Share.

As of the report date, the structure of the Board of Directors of the Company is as shown below:

<b>Türk Telekomünikasyon A.Ş. Members of the Board of Directors</b>			
<b>Name - Surname</b>	<b>Date of First Appointment to the Board of Directors</b>	<b>Duties at Türk Telekomünikasyon A.Ş. Over the Last Five Years</b>	<b>Duties Outside Türk Telekomünikasyon A.Ş.</b>
<b>Dr. Ömer Fatih Sayan</b>	Chairman of the Board- 21.12.2018  Board Member 04.09.2018	<ul style="list-style-type: none"> <li>• Member of the Early Identification and Management of Risks Committee of Türk Telekomünikasyon A.Ş.</li> <li>• Member of the Nomination and Remuneration Committee of Türk Telekomünikasyon A.Ş.</li> <li>• Türk Telekomünikasyon A.Ş. Access Infrastructure Committee Member</li> <li>• Türk Telekomünikasyon A.Ş. Investment Committee Member</li> </ul>	Deputy Minister at the Ministry of Transport and Infrastructure of the Republic of Türkiye
<b>Yiğit Bulut</b>	6.05.2014	<ul style="list-style-type: none"> <li>• Chairman of the Audit Committee of Türk Telekomünikasyon A.Ş.</li> <li>• Chairman of the Early Identification and Management of Risks Committee of Türk Telekomünikasyon A.Ş.</li> <li>• Chairman of the Nomination and Remuneration Committee of Türk Telekomünikasyon A.Ş.</li> <li>• Türk Telekomünikasyon A.Ş. Access Infrastructure Committee Member</li> <li>• Türk Telekomünikasyon A.Ş. Investment Committee Member</li> <li>• Chairman of the Tivibu Committee of Türk Telekomünikasyon A.Ş.</li> </ul>	<ul style="list-style-type: none"> <li>• Chief Advisor to the President of the Republic of Türkiye</li> <li>• Member of the Economy Policies Committee of the Presidency of the Republic of Türkiye</li> </ul>
<b>Selim Dursun</b>	4.09.2018	<ul style="list-style-type: none"> <li>• Member of the Audit Committee of Türk Telekomünikasyon A.Ş.</li> <li>• Member of the Corporate Governance Committee of Türk Telekomünikasyon A.Ş.</li> </ul>	
<b>Enver İskurt</b>	Group A- 19.03.2021  Group B- 31.03.2022	<ul style="list-style-type: none"> <li>• Chairman of the Corporate Governance Committee of Türk Telekomünikasyon A.Ş.</li> </ul> <p><b>Previous:</b></p> <ul style="list-style-type: none"> <li>• 28.12.2018-19.03.2021: Chairman of the Board of TNET A.Ş.</li> </ul>	Deputy Minister at the Ministry of Treasury and Finance of the Republic of Türkiye
<b>Salim Arda Ermut</b>	31.03.2022	<ul style="list-style-type: none"> <li>• Member of the Nomination and Remuneration Committee of Türk Telekomünikasyon A.Ş.</li> </ul>	<ul style="list-style-type: none"> <li>• Türkiye Wealth Fund General Manager</li> <li>• Türkiye Wealth Fund Board Member</li> <li>• Türkiye Varlık Fonu Yönetimi A.Ş. General Manager</li> <li>• Türkiye Varlık Fonu Yönetimi A.Ş. Board Member</li> <li>• Türkiye Katılım Sigorta A.Ş. Board Member</li> <li>• Türkiye Katılım Hayat A.Ş. Board Member</li> </ul>
<b>Ümit Önal</b>	31.03.2022	<ul style="list-style-type: none"> <li>• Türk Telekomünikasyon A.Ş. General Manager/CEO</li> <li>• Türk Telekomünikasyon A.Ş. Access Infrastructure Committee Member</li> <li>• Türk Telekomünikasyon A.Ş. Tivibu Committee Member</li> <li>• TT Mobil İletişim Hizmetleri A.Ş. General Manager/CEO</li> <li>• TNET A.Ş. General Manager/CEO</li> <li>• Net Ekran Televizyonculuk ve Medya Hizmetleri A.Ş. Chairman</li> <li>• TT Ödeme ve Elektronik Para Hizmetleri A.Ş. Chairman</li> </ul>	<ul style="list-style-type: none"> <li>• m-TOD (Mobile Telecommunication Operators Association) Chairman of the Board of Directors</li> <li>• RVD (Advertisers Association) Board Member</li> <li>• YASED (International Investors Association) Member</li> <li>• DEIK (Foreign Economic Relations Board) American</li> </ul>

		<ul style="list-style-type: none"> <li>• TTES Elektrik Tedarik Satış A.Ş. Chairman</li> <li>• TT Ventures Proje Geliştirme A.Ş. Chairman</li> <li>• TT Destek Hizmetleri A.Ş. Chairman</li> <li>• TTG Finansal Teknolojiler A.Ş. Chairman</li> <li>• TT Finansman A.Ş. Chairman</li> <li>• Netsia Inc. USA Chairman</li> </ul> <p><b>Previous:</b></p> <ul style="list-style-type: none"> <li>• Türk Telekomünikasyon A.Ş. Assistant General Manager of Sales and Customer Care</li> <li>• Assistant General Manager of Marketing and Customer Care (Acting)</li> <li>• TT Mobil İletişim Hizmetleri A.Ş. Assistant General Manager of Sales and Customer Care</li> <li>• TT Mobil İletişim Hizmetleri A.Ş. Assistant General Manager of Marketing and Customer Care (Acting)</li> <li>• TNET A. Ş. Assistant General Manager of Sales and Customer Care</li> <li>• Marketing and Customer Care Assistant General Manager (Acting)</li> <li>• AssisTT Rehberlik ve Müşteri Hizmetleri A.Ş. Vice Chairman</li> <li>• Argela Yazılım ve Bilişim Teknolojileri Sanayi ve Ticaret A.Ş. Vice Chairman</li> <li>• Sebit Eğitim ve Bilgi Teknolojileri A.Ş. Board Member</li> <li>• 11818 Rehberlik Ve Müşteri Hizmetleri A.Ş. Chairman</li> <li>• CETEL Telekom İletişim Sanayi ve Ticaret A.Ş. Board Member</li> </ul>	<ul style="list-style-type: none"> <li>Business Council Representative Member</li> <li>• TVYD (Television Broadcasters Association) Member - Yıldız Technopark Board Member</li> <li>• Turkish Industry and Business Association (TÜSİAD) Individual Member</li> </ul>
<b>Metin İlhan</b>	31.03.2022	<ul style="list-style-type: none"> <li>• Member of the Corporate Governance Committee of Türk Telekomünikasyon A.Ş.</li> </ul>	<ul style="list-style-type: none"> <li>Jurist Law Office</li> <li>Founding Partner</li> </ul>
<b>Deniz Yılmaz</b>	9.08.2023		<ul style="list-style-type: none"> <li>• General Manager of Financial Markets and Exchange of the Ministry of Treasury and Finance of the Republic of Türkiye</li> <li>• Member of the İhracatı Geliştirme A.Ş.</li> </ul>

Members of the Board of Directors were elected at the General Assembly dated August 9, 2023. In accordance with Article 10 of the Company's Articles of Association, the term of office of the members of the Board of Directors listed in the table above is 3 years from this date. In this context, expiry date of the members of the Board of Directors is August 9, 2026.

The General Manager of the Company is also a member of the Board of Directors.

Biographies of the members of Türk Telekom's Board of Directors are provided in the Board of Directors Section of the Annual Report and Investor Relations website. Pursuant to the Article 10 of the Articles of Association, the members of the Board of Directors shall hold office for a term of 3 years.

9 August 2023 dated Ordinary General Assembly Meeting of the Company, the nomination responsibilities of the Nomination and Remuneration Committee were fulfilled in accordance with the CMB legislation.

Group B shareholders presented three nominees for Independent Board members to the Nomination and Remuneration Committee, and the Nomination and Remuneration Committee prepared a report dated 3 August 2023 on the suitability of the nominees with respect to the independency criteria, and presented this report to the Board of Directors on the same date. After the Capital Markets Board provided consent for the nominees, three nominees of independent members of the Board of Directors were submitted to the General Assembly's approval and were also elected.

Statements of Independence that each independent Board Member has signed are presented in the appendix of this report. No circumstances were found which could jeopardise the independence of the Board of Directors in the activity period. No company rules have yet been internally established regarding the positions to be held by the members of the Board of Directors outside the Company.

### **Changes in the Members of the Board of Directors in 2022**

At the General Assembly Meeting dated 09.08.2023, members of the Board of Directors of our Company were elected. Dr. Ömer Fatih Sayan, Mehmet Ali Akben, Yiğit Bulut, Selim Dursun, Enver İskurt, Salim Arda Ermut, Ümit Önal, Metin İlhan and Deniz Yılmaz were elected as Board Members. Mehmet Ali Akben resigned from the Board of Directors on 01.12.2023.

### **Principles of Activity of the Board of Directors**

Pursuant to the Articles of Association, the Board of Directors shall meet at least four times a year or shall meet whenever the Company's business so requires. The activities of the Board of Directors are run by the Board Secretariat. At least ten business days before the meeting, a notice of the time of meeting and the agenda, which is accompanied by any relevant papers, are sent to the members of the Board of Directors. Meeting notices are sent to the members of the Board of Directors via e-mail. The agenda of the meetings of the Board of Directors is set by e-mails in view of the proposals set forth by members of the Board of Directors, the CEO - General Manager, Assistant General Managers and Executive members of the departments. The agenda is finalised by receiving the consent of the Chairman of the Board.

In 2023, the Company's Board of Directors convened 14 times in total to evaluate the strategic matters concerning the Company. The overall attendance rate of board members to the meetings was 94.5%. Pursuant to the Article 12 of Articles of Association, resolutions of these meetings are passed by a simple majority of the votes of the Directors present at such meeting unless the resolution relates to a "Supermajority Decision Relating to the Board". Supermajority Decisions Relating to the Board as stated in the Article 12 of the Articles of Association were taken with the presence and affirmative vote of seven Directors, at least one of which shall be a Director representing the Ministry of Treasury and Finance of the Republic of Türkiye. Questions arising at the meeting of Board of Directors and issues with multiple views are recorded into the minutes with the appropriate grounds of negative votes in detail. The rights of members of the Board of Directors representing the C Group shareholder are set out in the section of Voting Rights and Minority Shares. No negative votes on these resolutions were received. There were no significant transactions presented for approval of the independent directors and all related party transactions were approved by the majority of the independent directors. The Company has insured the damages

that will be caused by the faults of the members of the Board of Directors during their duties. The Company's existing Executive Liability Insurance policy has been implemented in a way that the total liability limit exceeds 25% of the Company's capital.

## **The Number, Structure and the Independence of Committees within the Board of Directors**

### **Audit Committee**

The Audit Committee was established with the Board Resolution dated 16 June 2008.

With the Board Resolution dated 13 May 2022, Independent Board Member Yiğit Bulut was selected as the Chairman of the Audit Committee, and independent Board Member Selim Dursun was elected to the membership position of the Audit Committee.

The Committee holds meetings at least once every three months. The Audit Committee gathered five times in 2023 and reviewed and monitored Türk Telekom Group's processes of accounting, finance and auditing as well as their processes for monitoring compliance with the law and regulations and their own code of business conduct, as well as such other matters which may be delegated specifically to the Committee by the Board from time to time; thus, carried out its duty effectively.

### **Corporate Governance Committee**

The Corporate Governance Committee was established with the Board Resolution dated 17 October 2012.

With the Board Resolution dated 13 May 2022, Independent Board Member Enver İskurt was appointed as Chairman of the Corporate Governance Committee, and Independent Board Member Selim Dursun and Board Member Metin İlhan and Investor Relations and Sustainability Director Gülsen Ayaz were elected as members of the Corporate Governance Committee.

The Corporate Governance Committee shall provide the implementation, improvement and adoption of corporate governance principles within the Company and shall convene as often as deemed necessary to ensure the effectiveness of its work. In 2023, the Corporate Governance Committee held two meetings and carried out its tasks effectively.

### **Nomination and Remuneration Committee**

"Nomination Committee" and "Remuneration Committee", which were established to operate under the Board of Directors within the scope of article 4.5.1. of Corporate Governance Principles of Capital Markets Board's Corporate Governance Communique, II-17.1., have been abolished. In order to carry out the current duties of the abolished committees, the "Nomination and Remuneration Committee" is established to operate under the Board of Directors of our Company on 17 June 2022.

Independent Board Member Yiğit Bulut serves as the Chairman of the Nomination and Remuneration Committee, while Dr. Ömer Fatih Sayan, Chairman of the Board of Directors, and Salim Arda Ermut, Board Member, serve as Nomination and Remuneration Committee Members.

In 2023, the Committee held three meetings and carried out its tasks effectively.

### **Early Identification and Management of Risks Committee**

The Early Identification and Management of Risks Committee was established with the Board Resolution dated 14 August 2013.

Pursuant to the Board Resolution dated May 13, 2022 independent Board Member Yiğit Bulut serves as the Chairman of the Early Identification and Management of Risks Committee, whereas Chairman of the Board of Directors Ömer Fatih Sayan serve as members of the Committee.

The Early Identification and Management of Risks Committee convenes every two months and carries out its tasks effectively. In 2023, the Committee held a total of five meetings. The Early Identification and Management of Risks Committee was established with the following aims:

- To identify any potential risks that could jeopardise the existence, development and continuity of the Türk Telekom Group,
- To establish the Corporate Risk Management System to implement necessary measures and actions with the aim of eliminating identified risks, and to ensure the system's continuity and to improve it if necessary,
- To conduct activities related to the risk management and monitoring via risk management tools within the scope of a risk management system,
- To ensure that the findings received from the Corporate Risk Management System form an important component of the decision-making mechanism, and to present reports to the Board of Directors on these issues.

Independent Board Member Yiğit Bulut is serving as the Chairman of the Early Identification and Management of Risks Committee, Chairman of the Audit Committee and Chairman of the Nomination and Remuneration Committee, while independent Board Member Selim Dursun serves as both the Member of the Corporate Governance Committee and the Member of the Audit Committee.

## **Türk Telekom Risk Management and Internal Control Mechanism**

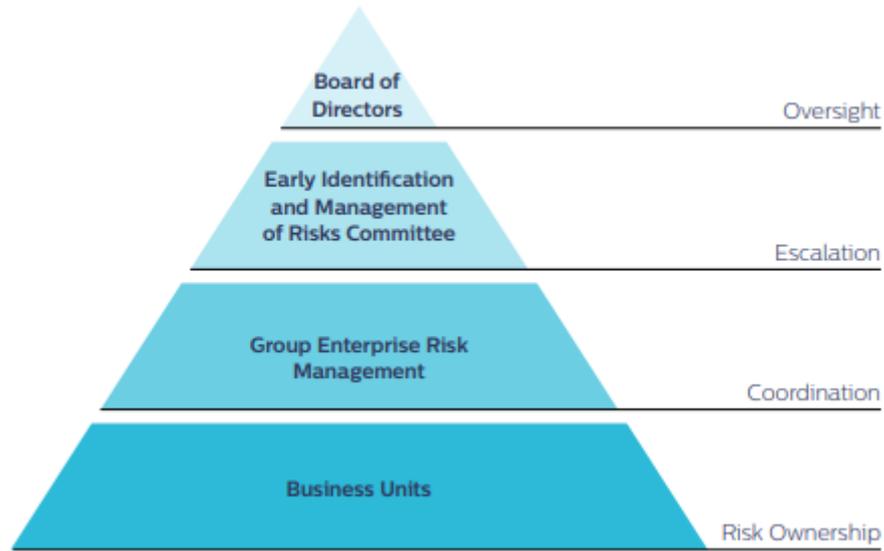
### **Governance Structure**

Risk management and Internal Control is a natural part of the activities carried out by all Türk Telekom employees. The Corporate Risk Management approach is aimed at serving as an integral part of decision-making mechanisms by integrating the approach into activities and processes at all levels.

The Board of Directors holds both the final authority and responsibility for the effectiveness of Corporate Risk Management. The Board of Directors conducts this responsibility, which involves more of a supervision, through the Early Identification and Management of Risks Committee. All organisational levels of the Group, particularly the senior management and risk holders, contribute to and support the Corporate Risk Management and Internal Control implementation processes. Within the scope of the Risk Management and Internal Control efforts, it is aimed to internalise

a risk and control culture throughout the Group and all activities are carried out with the contribution of all stakeholders to whom risks are associated. Risk Management and Internal Control is a natural part of the work undertaken by all employees.

### **Türk Telekom Group Corporate Risk Management Governance Model**



According to the Türk Telekom governance structure;

The Board of Directors examines and supervise the risks and opportunities to which Türk Telekom Group is exposed, in line with the Group strategies.

Early Identification and Management of Risks Committee was established with the decision of the Board of Directors dated 14 August 2013 in accordance with Article 378 of the Turkish Commercial Code No. 6102, and the relevant regulations of the Capital Markets Board. Its organisation, duties and responsibilities were published under the title of The Tasks and Working Principles of the Early Identification and Management of Risks Committee.

An Internal Control Policy was established to define Türk Telekom Group's internal control objectives and policies, to regulate the corporate control environment and to establish a basis for the corporate control culture. Internal Control Standards were established in order to define the internal control implementation principles of Türk Telekom Group, to determine the standards required to achieve the objectives set out in the internal control policy and to establish a common internal control language and practice to support communication between employees.

While the Enterprise Risk and Business Continuity Department reports to our Company's General Manager, it also works functionally under the Early Identification and Management of Risks Committee, which was established within the Board of Directors.

The Enterprise Risk and Business Continuity Department is responsible for determining and improving the standards related to the Corporate Risk Management System, the coordination of Corporate Risk Management processes carried out throughout the

Group, monitoring of the current and improvement levels of identified risks and reporting them to the relevant management levels and the coordination of business continuity management activities as the bearer of the business interruption risk, which is one of the most important risks of the company.

Business units take the necessary measures by assuming responsibility of the risks. Risk management is a natural part of the work of all employees. All Company employees are responsible for complying with the risk management policy, effectively managing risks related to their field of activity and taking the necessary measures to comply with the relevant legislation.

The risks of the Group companies are also managed in line with the risk management standards, which were established for Türk Telekom.

### **Risk Lifecycle**

Work is carried out to manage potential risks effectively and under a holistic approach. For this purpose, the risks the Company exposed to are identified by the business and technology teams; and the root causes and potential consequences of the identified risks are determined. With the Bow-Tie Analysis used in this process, the end-to-end complete risk profile is determined, including checkpoints, from root causes to their effects on targets.

The current status of the risks is measured and monitored by evaluating the possibility of their realisation and the effects they will create when they occur. While conducting a risk analysis, it is considered that the impact of a risk may affect more than one area. Existing controls on the risks which have been identified, evaluated and prioritised by the relevant parties are determined, and their effectiveness is evaluated. In order to achieve the objectives, actions are set out which aim to be compatible with risk appetite by seeking to ensure the optimal balance between risk and reward. When making decisions to manage risks, risk owners conduct cost-benefit analysis and take stakeholder expectations into account. Moreover, assessment is carried out to see whether the management of the risk requires special expertise which is not available within the business units. The four main options to be evaluated in this context are as follows:

- Accept the Risk
- Reduce the Risk
- Transfer the Risk (Share)
- Avoid the Risk

### **Internal Control Environment**

In order to achieve strategic objectives at Türk Telekom, to ensure the effectiveness and efficiency of activities, to ensure the reliability and accuracy of financial information, to protect the customers' personal data and the Company assets, and to ensure compliance with the laws, regulations, policies and procedures, the necessary internal control environment was established within the Company.

The controls are actions which help operational objectives to be achieved by reducing the probability of risks being realised and/or the impact that would occur if the risks were realised. It is aimed to integrate the control activities into systems and processes while the relevant structure is still in the design phase.

The risk owner identifies the existing controls together with the stakeholders for accurate determination of the level of the risk and also performs self-assessment of the effectiveness of these controls together with the control owners.

With the periodic control activities carried out by the Internal Control Department, it is aimed to provide reasonable assurance regarding the processes by testing the control points designated in the processes.

### **Prohibition on Carrying out Business and Competing with the Company**

On this subject, the Company has adopted practices that are aligned with Articles 395 and 396 of the Turkish Commercial Code and Principles of Corporate Governance annexed to Communiqué II-17.1 on Corporate Governance.

During the Ordinary General Assembly Meeting dated 9 August 2023, the General Assembly permitted the members of the Board of Directors to perform the works set forth in Articles 395 and 396 of the Turkish Commercial Code, and pursuant to Corporate Governance Communiqué No: II.17.1, the General Assembly was informed of the transactions realised during the year by the controlling shareholders, members of the Board of Directors, the senior executives and their spouses and their relatives by blood and marriage up to the second degree to conduct material transactions which may cause a conflict of interest for the Company or the Company's subsidiaries and/or to perform any transaction in the category of commercial affair falling into the scope of the fields of activity of the Company or its subsidiaries on their own or others' behalf or to acquire shares in another company engaged in the same type of commercial activities under the capacity of unlimited partner.

### **Remuneration of Members of the Board of Directors and Senior Executives**

The shareholders were informed of the remuneration basis and criteria used to determine all kinds of rights, benefits, and salaries provided to the members of the Board of Directors and senior executives in the Ordinary General Assembly Meeting dated August 09, 2023. This information was publicly disclosed and was also posted on the Investor Relations website of the Company. Remuneration of members of the Board of Directors is determined by the General Assembly in accordance with Article 408 of Turkish Commercial Code No. 6102 and Article 8 of the Company's Articles of Association.

At the Ordinary General Assembly Meeting dated August 09, 2023, it was resolved that the net remuneration to be paid to each of the members of the Board of Directors in accordance with the Company's Remuneration Policy in relation to their activities in 2023 be determined at the Ordinary General Assembly Meeting of 31 March 2022 at a growth rate between the current value of the monthly ratio used in the civil officers salary calculation as of the date of the last General Assembly Meeting and its current value, at an increase rate of annual consumer price index announced by Turkish Statistical Institute (TÜİK) each year on January and July as of the date of 01.04.2024 to the next General Assembly Meeting.

There is no performance measurement and a performance-based rewarding system in place for Board members.

The Company has never lent money or extended loans to any Board member or executive, no credit has been extended under personal loans through third persons, nor have any guarantees been provided such as suretyship in their favour.

The remuneration of directors and other members of key management for 2022 and 2023 are as follows collectively:

<b>(TL thousand)</b>	<b>1 January 2022 – 31 December 2022</b>	<b>1 January 2023 – 31 December 2023</b>
Short-term benefits	280,738	299,617
Remunerations and similar fees	254,556	256,982
Attendance fees	26,183	42,634
Long-term defined benefits	7,299	9,865
Social Security Institution Premiums	7,299	9,865
<b>Total</b>	<b>288,037</b>	<b>309,482</b>

## **STAKEHOLDERS**

Stakeholders of Türk Telekom are individuals, institutions or interest groups such as employees, creditors, customers, suppliers, dealers, trade unions and various non-governmental organisations which have a share in achieving the Company's goals or are involved in the fulfilment of the Company's activities.

In its operations and activities, Türk Telekom takes every effort to protect the rights of its stakeholders as regulated by relevant legislation and mutual agreements.

In cases where the rights of the stakeholders cannot be protected by legislation and mutual agreements, the interests of the stakeholders are protected in accordance with the rules of good faith and to the extent of the Company's capabilities.

### **Company Policies Regarding Stakeholders**

Türk Telekom's policies regarding its employees are carried out in accordance with the human resources and human rights policies, while its relations with suppliers are guided by the practices described in its procurement policy.

As a responsible employer, Türk Telekom assigns utmost priority to the execution of the business processes and transactions of stakeholders with whom it has a connection, in accordance with the labour and social security laws and the Company's Human Rights Policy.

Türk Telekom listens the requests and suggestions of its customers and exercises maximum effort to resolve their complaints as quickly as possible, in a fair, impartial and confidential manner, in accordance with laws, regulations and the Company rules.

Türk Telekom attaches importance to ensuring that its relations with companies such as dealers, contractors and business partners, with which it has engaged in commercial business relations, are proper, consistent and reliable, and that all kinds of business is carried out in conformity with the relevant contracts, laws or regulations. In the contracts signed with the mentioned companies, objective criteria such as compliance

with principles and practices, and the benefits and costs by taking into account the opinions of legal and relevant business units, are taken into consideration.

**Company Policies Regarding Stakeholders are listed below.**

Corporate Governance Policies:

- [Disclosure Policy](#)
- [Dividend Policy](#)
- [Remuneration Policy](#)
- [Board of Directors Women Membership Policy](#)
- [Donation Policy](#)
- [Compensation Policy](#)
- [Internal Directive of the General Assembly](#)
- [Code of Ethics](#)

Sustainability Policies

- [Sustainability Policy](#)
- [Human Rights Policy](#)
- [Human Resources Policy](#)
- [Anti-Bribery and Anti-Corruption Policy](#)
- [Information Security Policy](#)
- [Procurement Policy](#)
- [Integrated Management System Policy](#)

**Informing Stakeholders**

Türk Telekom pays utmost attention to communication with stakeholders and adopts the principle of transparency in its disclosures. The Company has been publicly traded on Borsa Istanbul since 2008 and its shareholders and investors are kept informed in line with the principles of public disclosure.

The Company's Marketing and Customer Care Department efficiently handles the requests of Türk Telekom customers for information concerning services and products, addresses comments or complaints, and provides solutions to customer problems.

Intracompany disclosures are provided through Internal Communication Group Management.

Suppliers, dealers, investors, employees and other stakeholders are informed of the Company's practices vis-à-vis stakeholders, through public policies published in Turkish and in English on the Company's website.

## Corporate Governance Compliance Report

Company Compliance Status						
	Yes	Partial	No	Exempted	Not Applicable	Explanation
<b>1.1. FACILITATING THE EXERCISE OF SHAREHOLDER RIGHTS</b>						
1.1.2 -Up-to-date information and disclosures which may affect the exercise of shareholder rights are available to investors at the corporate website.	X					
<b>1.2. RIGHT TO OBTAIN AND REVIEW INFORMATION</b>						
1.2.1 - The company ensures the clarity of the General Assembly agenda, and that an item on the agenda does not cover multiple topics	X					
<b>1.3. GENERAL ASSEMBLY</b>						
1.3.2 - The company ensures the clarity of the General Assembly agenda, and that an item on the agenda does not cover multiple topics.	X					
1.3.7 - Insiders with privileged information have informed the board of directors about transactions conducted on their behalf within the scope of the company's activities in order for these transactions to be presented at the General Shareholders' Meeting.					X	Such a situation did not occur.
1.3.8 - Members of the board of directors who are concerned with specific agenda items, auditors, and other related persons, as well as the officers who are responsible for the preparation of the financial statements were present at the General Shareholders' Meeting.	X					
1.3.10 - The agenda of the General Shareholders' Meeting included a separate item detailing the amounts and beneficiaries of all donations and contributions.		X				This issue constitutes a separate item of the agenda of the General Assembly Meeting; and as there are many donations and beneficiaries, a summary information is provided.
1.3.11 - The General Shareholders' Meeting was held open to the public, including the stakeholders, without having the right to speak.			X			There was no participation request to the General Assembly Meeting by the media in fiscal year 2023.
<b>1.4. VOTING RIGHTS</b>						
1.4.1 - There is no restriction preventing shareholders from exercising their shareholder rights.	X					
1.4.2 - The company does not have shares that carry privileged voting rights.		X				There is no privileged voting rights. Group (A), (B) and (C) shareholders has been granted the privilege to nominate candidates to the Board of Directors in Article 8 of the Company's Articles of Association.
1.4.3 - The Articles of Association extend the use of minority rights to those who own less than one twentieth of the outstanding shares, and expand the scope of the minority rights.					X	Such a situation did not occur.
<b>1.5. MINORITY RIGHTS</b>						
1.5.1 - The company pays maximum diligence to the exercise of minority rights.	X					
1.5.2 - The Articles of Association extend the use of minority rights to those who own less than one twentieth of the outstanding shares, and expand the scope of the minority rights.			X			There is no provision in the Articles of Association to be granted minority rights to shareholders who have less than one twentieth of the capital. At the same time, attention is paid to the use of minority rights within the scope of TCC and CMB regulations.
<b>1.6. DIVIDEND RIGHT</b>						

1.6.1 - The dividend policy approved by the General Shareholders' Meeting is posted on the company website.	X					
1.6.2 - The dividend distribution policy comprises the minimum information to ensure that the shareholders can have an opinion on the procedure and principles of dividend distributions in the future.	X					
1.6.3 - The reasons for retaining earnings, and their allocations, are stated in the relevant agenda item.	X					
1.6.4 - The board reviewed whether the dividend policy balances the benefits of the shareholders and those of the company.	X					
<b>1.7. TRANSFER OF SHARES</b>						
1.7.1 - There are no restrictions preventing shares from being transferred.		X				Group C Privileged Share refers to 1 Group C share held by Ministry of Finance and Treasury in accordance with Telegraph and Telephone Law No. 406. Without prejudice to Article 6/A of the Articles of Association of the Company, All shares of Türk Telekom except C Group 1 share may be sold. In accordance with Article 6/A.2. of the Company's Articles of Associate, transfer of the shares of Group A shareholder is subject to the veto right of the Group C share. According to Article 6 / A of the Company's Articles of Association, the transfer transaction of registered shares which affects the management control, and registration transaction of such transfer to the share ledger shall not be performed without the affirmative vote of the C Group Privileged Shareholder.
<b>2.1. CORPORATE WEBSITE</b>						
2.1.1 - The company website includes all elements listed in Corporate Governance Principle 2.1.1.	X					
2.1.2 - The shareholding structure (names, privileges, number and ratio of shares, and beneficial owners of more than 5% of the issued share capital) is updated on the website at least every 6 months.	X					
2.1.4 - The company website is prepared in other selected foreign languages, in a way to present exactly the same information with the Turkish content.	X					
<b>2.2. ANNUAL REPORT</b>						
2.2.1 - The board of directors ensures that the annual report represents a true and complete view of the company's activities.	X					
2.2.2 - The annual report includes all elements listed in Corporate Governance Principle 2.2.2.	X					
<b>3.1. CORPORATION'S POLICY ON STAKEHOLDERS</b>						
3.1.1 - The rights of the stakeholders are protected pursuant to the relevant regulations, contracts and within the framework of bona fides principles.	X					
3.1.3 - Policies or procedures addressing stakeholders' rights are published on the company's website.	X					
3.1.4 - A whistleblowing programme is in place for reporting legal and ethical issues.	X					
3.1.5 - The company addresses conflicts of interest among stakeholders in a balanced manner.	X					
<b>3.2. SUPPORTING THE PARTICIPATION OF THE STAKEHOLDERS IN THE CORPORATION'S MANAGEMENT</b>						
3.2.1 - The Articles of Association, or the internal regulations (terms of		X				There are internal directives about this topic. Models for participation of company employees in management

reference/manuals), regulate the participation of employees in management.						such as Occupational Health and Safety Boards, Disciplinary Boards, Dispute Resolution Boards, Inventor Idea System and the DNA (What Does Your Experience Tell Me?) continued to be developed in 2023.
3.2.2 - Surveys/other research techniques, consultation, interviews, observation method etc. were conducted to obtain opinions from stakeholders on decisions that significantly affect them.	X					
<b>3.3. HUMAN RESOURCES POLICY</b>						
3.3.1 - The company has adopted an employment policy ensuring equal opportunities, and a succession plan for all key managerial positions.	X					
3.3.2 - Recruitment criteria are documented.	X					
3.3.3 - The company has a policy on human resources development, and organises trainings for employees.	X					
3.3.4 - Meetings have been organised to inform employees on the financial status of the company, remuneration, career planning, education and health.	X					
3.3.5 - Employees, or their representatives, were notified of decisions impacting them. The opinion of the related trade unions was also taken.	X					
3.3.6 - Job descriptions and performance criteria have been prepared for all employees, announced to them and taken into account to determine employee remuneration.	X					
3.3.7 - Measures (procedures, trainings, raising awareness, goals, monitoring, complaint mechanisms) have been taken to prevent discrimination, and to protect employees against any physical, mental, and emotional mistreatment.	X					
3.3.8 - The company ensures freedom of association and supports the right for collective bargaining.	X					
3.3.9 - A safe working environment for employees is maintained.	X					
<b>3.4. RELATIONS WITH CUSTOMERS AND SUPPLIERS</b>						
3.4.1 - The company measured its customer satisfaction, and operated to ensure full customer satisfaction.	X					
3.4.2 - Customers are notified of any delays in handling their requests.	X					
3.4.3 - The company complied with the quality standards with respect to its products and services.	X					
3.4.4 - The company has in place adequate controls to protect the confidentiality of sensitive information and business secrets of its customers and suppliers.	X					
<b>3.5. ETHICAL RULES AND SOCIAL RESPONSIBILITY</b>						
3.5.1 - The board of the corporation has adopted a code of ethics, disclosed on the corporate website.	X					
3.5.2 - The company has been mindful of its social responsibility and has adopted measures to prevent corruption and bribery.	X					
<b>4.1. ROLE OF THE BOARD OF DIRECTORS</b>						
4.1.1 - The board of directors has ensured strategy and risks do not threaten the long-term interests of the company, and that effective risk management is in place.	X					
4.1.2 - The agenda and minutes of board meetings indicate that the board of directors discussed and approved strategy, ensured resources were adequately allocated, and monitored company and management performance.	X					
<b>4.2. ACTIVITIES OF THE BOARD OF DIRECTORS</b>						

4.2.1 - The board of directors documented its meetings and reported its activities to the shareholders.	X					
4.2.2 - Duties and authorities of the members of the board of directors are disclosed in the annual report.	X					
4.2.3 - The board has ensured the company has an internal control framework adequate for its activities, size and complexity.	X					
4.2.4 - Information on the functioning and effectiveness of the internal control system is provided in the annual report.	X					
4.2.5 - The roles of the Chairman and Chief Executive Officer are separated and defined.	X					
4.2.7 - The board of directors ensures that the Investor Relations department and the corporate governance committee work effectively. The board works closely with them when communicating and settling disputes with shareholders.	X					
4.2.8 - The company has subscribed to a Directors and Officers liability insurance covering more than 25% of the capital.	X					
<b>4.3. STRUCTURE OF THE BOARD OF DIRECTORS</b>						
4.3.9 - The board of directors has approved the policy on its own composition, setting a minimal target of 25% for female directors. The board annually evaluates its composition and nominates directors so as to be compliant with the policy.		X				Our Company has a Board of Directors Women Membership Policy. It is aimed to reach this goal within the next 5 years from the date of publication of the policy, by assigning at least one woman member to the Board of Directors and assigning woman member (s) to the Board of Directors.
4.3.10 - At least one member of the audit committee has 5 years of experience in audit/accounting and finance.	X					
<b>4.4. BOARD MEETING PROCEDURES</b>						
4.4.1 - Each board member attend the majority of the board meetings in person or via an electronic board meeting system	X					
4.4.2 - The board has formally approved a minimum time by which information and documents relevant to the agenda items should be supplied to all board members.	X					
4.4.3 - The opinions of board members that could not attend the meeting, but did submit their opinion in written format, were presented to other members.	X					
4.4.4 - Each member of the board has one vote.	X					
4.4.5 - The board has a charter/written internal rules defining the meeting procedures of the board.	X					
4.4.6 - Board minutes document that all items on the agenda are discussed, and board resolutions include director's dissenting opinions if any.	X					
4.4.7 - There are limits to external commitments of board members. Shareholders are informed of board members' external commitments at the General Shareholders' Meeting.		X				There is no restriction for the members of the Board of Directors to assume any other duties outside the Company. The duties of the members of the Board of Directors outside the Company are presented in the annual report and in their resumes published on the website.
<b>4.5. BOARD COMMITTEES</b>						
4.5.5 - Board members serve in only one of the Board's committees.			X			The number of independent members on the Board of Directors does not allow for Board members to serve in only one of the Board's committees. Therefore some independent members of the Board of Directors are assigned in more than on committee.
4.5.6 - Committees have invited persons to the meetings as deemed necessary to obtain their views.	X					
4.5.7 - If external consultancy services are used, the independence of the provider is stated in the annual report.					X	In fiscal year 2023, the committees have not received any consultancy services hence this subject was not included in the annual report.

4.5.8 - Minutes of all committee meetings are kept and reported to board members.	X					
<b>4.6. FINANCIAL RIGHTS</b>						
4.6.1 - The board of directors has conducted a board performance evaluation to review whether it has discharged all its responsibilities effectively.			X			The performance of the Board of Directors has not been evaluated.
4.6.4 - The company did not extend any loans to its board directors or executives, nor extended their lending period or enhanced the amount of those loans, or improve conditions thereon, and did not extend loans under a personal credit title by third parties or provided guarantees such as surety in favour of them.	X					
4.6.5 - The individual remuneration of board members and executives is disclosed in the annual report.		X				The remuneration of provided to executives are disclosed in aggregated form on annual report and are not disclosed on individual basis.

## Corporate Governance Information Form

1. SHAREHOLDERS	
<b>1.1. Facilitating the Exercise of Shareholders Rights</b>	
The number of investor meetings (conference, seminar/etc.) organised by the company during the year	<p>Türk Telekom Investor Relations department participates in various conferences and meetings in Türkiye and abroad every year.</p> <p>In 2023, Türk Telekom held meetings with 176 equity and bond investors from different geographies and considers providing timely, continuous and accurate information to its investors among its top priorities. Türk Telekom Investor Relations participated in investor conferences and webinars, and organised roadshows. Moreover, following the disclosure of the quarterly financial and operational results, Investor Relations department continued to hold teleconferences in order to share the assessment of the Company's senior management for the relevant quarter and to provide investors and analysts with the opportunity to pose their questions to the management of the Company.</p> <p>Investor Relations department continued to organise teleconferences following the disclosure of the quarterly financial and operational results in order to share the senior management's views on quarterly operations and to provide investors and analysts the opportunity to ask their questions to the management.</p>
<b>1.2. Right to Obtain and Examine Information</b>	
The number of special audit request(s)	No requests were made for the appointment of a special auditor in the reporting period.
The number of special audit requests that were accepted at the General Shareholders' Meeting	None
<b>1.3. General Assembly</b>	
Link to the PDP announcement that demonstrates the information requested by Principle 1.3.1. (a-d)	<a href="https://www.kap.org.tr/en/Bildirim/1172774">https://www.kap.org.tr/en/Bildirim/1172774</a> <a href="https://www.kap.org.tr/en/Bildirim/1183035">https://www.kap.org.tr/en/Bildirim/1183035</a> <a href="https://www.kap.org.tr/en/Bildirim/1187717">https://www.kap.org.tr/en/Bildirim/1187717</a>
Whether the company provides materials for the General Shareholders' Meeting in English and Turkish at the same time	Documents are also shared simultaneously on Public Disclosure Platform (KAP) and on the company's investor relations website in English.
The links to the PDP announcements associated with the transactions that are not approved by the majority of independent directors or by unanimous votes of present board members in the context of Principle 1.3.9	No such transaction took place during the year.
The links to the PDP announcements associated with related party transactions in the context of Article 9 of the Communique on Corporate Governance (II-17.1)	No such transaction took place during the year.
The links to the PDP announcements associated with common and continuous transactions in the context of Article 10 of the Communique on Corporate Governance (II-17.1)	<a href="https://www.kap.org.tr/en/Bildirim/1181015">https://www.kap.org.tr/en/Bildirim/1181015</a>
The name of the section on the corporate website that demonstrates the donation policy of the company	<a href="https://www.ttyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies">https://www.ttyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies</a> <a href="https://www.ttyatirimciliskileri.com.tr/media/pl5nrfuj/donation-policy.pdf">https://www.ttyatirimciliskileri.com.tr/media/pl5nrfuj/donation-policy.pdf</a>
The relevant link to the PDP with minute of the General Shareholders' Meeting where the donation policy has been approved	<a href="https://www.kap.org.tr/en/Bildirim/1014683">https://www.kap.org.tr/en/Bildirim/1014683</a> <a href="https://www.kap.org.tr/en/Bildirim/1014708">https://www.kap.org.tr/en/Bildirim/1014708</a>
The number of the provisions of the articles of association that discuss the participation of stakeholders to the General Shareholders' Meeting	There is no such provision in the articles of association.
Identified stakeholder groups that participated in the General Shareholders' Meeting, if any	There was no participation in General Assemblies held in 2023 except by shareholders.
<b>1.4. Voting Rights</b>	
Whether the shares of the company have differential voting rights	No
In case that there are voting privileges, indicate the owner and percentage of the voting majority of shares.	There is no differential voting rights. Group (A), (B) and (C) shareholders are granted the privilege to nominate candidates for the Board of Directors in Article 8 of the company's Articles of Association.
The percentage of ownership of the largest shareholder	61.68% (Türkiye Wealth Fund holds 1.68% of the publicly traded shares.)
<b>1.5. Minority Rights</b>	
Whether the scope of minority rights enlarged (in terms of content or the ratio) in the articles of the association	No
If yes, specify the relevant provision of the articles of association.	There is no provision in the Articles of Association to grant minority rights to shareholders who have less than one twentieth of the capital. However, compliance with the use of minority rights within the scope of TTK and CMB regulations is ensured.
<b>1.6. Dividend Right</b>	
The name of the section on the corporate website that describes the dividend distribution policy	<p>Corporate Governance Policies</p> <a href="https://www.ttyatirimciliskileri.com.tr/tr-tr/kurumsal-yonetim/sayfalar/kurumsal-yonetim-politikalari">https://www.ttyatirimciliskileri.com.tr/tr-tr/kurumsal-yonetim/sayfalar/kurumsal-yonetim-politikalari</a> <a href="https://www.ttyatirimciliskileri.com.tr/media/Oz4d0c1y/kar-dagitim-politikasi.pdf">https://www.ttyatirimciliskileri.com.tr/media/Oz4d0c1y/kar-dagitim-politikasi.pdf</a>
Minutes of the relevant agenda item in case the board of directors proposed to the general assembly not to distribute dividends, the reason	<p>Board of Director's Resolution;</p> <p>Türk Telekom, the leading integrated telecommunications company, continues its activities by prioritising its strategic goals and investments in order to sustain its technological leadership</p>

<p>for such proposal and information as to use of the dividend.</p>	<p>while maintaining a healthy liquidity and investment balance, and a strong balance sheet. Our Board of Directors resolved to propose at the 2022 Ordinary General Assembly that Türk Telekom pays no dividend out of 2022 earnings. The decision reflects the need for elevated caution in light of the recent events and the consideration of our Company's liquidity and investment requirements along with possible volatility in financial markets on global or domestic macro uncertainties.</p> <p>General Assembly Meeting Minutes It is seen that the above mentioned shareholders proposed the Company's Board of Director's Resolution dated 22.02.2023 and numbered 07 regarding the profit distribution shall be approved.</p> <p>1 -The Company's net profit calculated according to the independently audited consolidated financial tables prepared in accordance with the provisions of "Capital Markets Board (CMB) Communique About Financial Reporting in Capital Markets No. II-14.1" is TL 4,134,846,000 for the fiscal year of 2022.</p> <p>2- Pursuant to the CMB Communique on Dividends No: II-19.1, the profit after tax amount of TL 4,134,846,000 shall be the base amount for dividend distribution,</p> <p>3- The Company is not required to take any reserves for 2022 as per the Article 519 of Turkish Commercial Code because it has already reached the general legal reserve limit,</p> <p>Accordingly, the Company is allowed to make a proposal, subject to the provisions of its Articles of Association, that the net profit amounting to TL 4,134,846,000 which is based on the independently audited consolidated financial statements, shall be recorded as extraordinary reserves.</p> <p>The Chairman put the proposal to vote, regarding the approval of the decision of the Board of Directors of the Company, dated 22.02.2023 Nr. 07, which was submitted for the examination of the shareholders in the company's website <a href="http://www.tyativimciiliskileri.com.tr">www.tyativimciiliskileri.com.tr</a>, on the Public Disclosure Platform, EGAS and in the files distributed to physically attended shareholders in the meeting. Chairman put the proposal of the board of directors to a vote accordingly. As a result of the voting, the abovementioned Proposal was approved by a majority of TL 10,401 NEGATIVE and TL 3,119,621, 808 AFFIRMATIVE votes.</p>
<p>PDP link to the related general shareholder meeting minutes in case the board of directors proposed to the general assembly not to distribute dividends</p>	<p><a href="https://www.kap.org.tr/en/Bildirim/1183035">https://www.kap.org.tr/en/Bildirim/1183035</a></p>

#### Genel Kurul Toplantıları

General Meeting Date	The number of information requests received by the company regarding the clarification of the agenda of the General Shareholders' Meeting	Shareholder participation rate to the General Shareholders' Meeting	Percentage of shares directly present at the GSM	Percentage of shares represented by proxy	Specify the name of the page of the corporate website that contains the General Shareholders' Meeting minutes, and also indicates for each resolution the voting levels for or against	Specify the name of the page of the corporate website that contains all questions asked in the general assembly meeting and all responses to them	The number of the relevant item or paragraph of General Shareholders' Meeting minutes in relation to related party transactions	The number of declarations by insiders received by the board of directors	The link to the related PDP general shareholder meeting notification
09.08.2023	3	89.13%	0.0003%	86.6%	Corporate Governance/ General Assembly Meeting Information	Corporate Governance / General Assembly Meeting Information			<a href="https://www.kap.org.tr/en/Bildirim/1183035">https://www.kap.org.tr/en/Bildirim/1183035</a>

## 2. DISCLOSURE AND TRANSPARENCY

### 2.1. Corporate Website

<p>Specify the name of the sections of the website providing the information requested by the Principle 2.1.1.</p>	<p><a href="https://www.tyativimciiliskileri.com.tr/en-us/pages/home-page">https://www.tyativimciiliskileri.com.tr/en-us/pages/home-page</a></p> <p>Türk Telekom Group –Ownership Structure, Announcements and Disclosures Corporate Governance-Board of Directors, Committees, Senior Management, Insiders with Administrative Responsibilities, Corporate Governance Compliance Report, Corporate Governance Rating, General Assembly Meeting Information, Articles of Association and Trade Registry Information, Internal Audit and Risk Management, Related Party Transactions, Code of Ethics, Policies, Independent Auditor</p>
<p>If applicable, specify the name of the sections of the website providing the list of shareholders (ultimate beneficiaries) who directly or indirectly own more than 5% of the shares</p>	<p><a href="https://www.tyativimciiliskileri.com.tr/en-us/turk-telekom-group/investing-in-turk-telekom/pages/ownership-structure">https://www.tyativimciiliskileri.com.tr/en-us/turk-telekom-group/investing-in-turk-telekom/pages/ownership-structure</a></p> <p><a href="https://www.tyativimciiliskileri.com.tr/media/imupesmv/hissedar-yapisi-en.pdf">https://www.tyativimciiliskileri.com.tr/media/imupesmv/hissedar-yapisi-en.pdf</a></p>
<p>List of languages for which the website is available</p>	<p>Turkish, English</p>

### 2.2. Annual Report

The page numbers and/or name of the sections in the Annual Report that demonstrate the information requested by principle 2.2.2.

<p>a) The page numbers and/or name of the sections in the Annual Report that</p>	<p>Corporate Governance Principles Compliance Report section</p>
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demonstrate the information on the duties of the members of the board of directors and executives conducted out of the company and declarations on independence of board members	
b) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on committees formed within the board structure	Corporate Governance Principles Compliance Report section
c) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the number of board meetings in a year and the attendance of the members to these meetings	Corporate Governance Principles Compliance Report section
c) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on amendments in the legislation which may significantly affect the activities of the corporation	There was no legislative amendments that could significantly affect the Company's operations in 2023.
d) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on significant lawsuits filed against the corporation and the possible results thereof	Consolidated Independent Audit Report/Commitment and Obligations
e) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the conflicts of interest of the corporation among the institutions that it purchases services on matters such as investment consulting and rating and the measures taken by the corporation in order to avoid from these conflicts of interest	Corporate Governance Principles Compliance Report Section/Other information according to the legislation
f) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the cross ownership subsidiaries that the direct contribution to the capital exceeds 5%	Capital and Shareholder Structure section
g) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on social rights and professional training of the employees and activities of corporate social responsibility in respect of the corporate activities that arises social and environmental results	Corporate Governance Principles Compliance Report and 2022 Sustainability Report, sections titled Community Contribution Focus
<b>3. STAKEHOLDERS</b>	
<b>3.1. Corporation's Policy on Stakeholders</b>	
The name of the section on the corporate website that demonstrates the employee remedy or severance policy	<a href="https://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies">https://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies</a> <a href="https://www.tyatirimciliskileri.com.tr/media/u1jd4zif/compensation-policy.pdf">https://www.tyatirimciliskileri.com.tr/media/u1jd4zif/compensation-policy.pdf</a>
The number of definitive convictions the company was subject to in relation to breach of employee rights	0
The position of the person responsible for the alert mechanism (i.e. whistleblowing mechanism)	Business Ethics Committee
The contact detail of the company alert mechanism	<a href="mailto:etik@turktelekom.com.tr">etik@turktelekom.com.tr</a> <a href="https://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-committee-communication-form">https://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-committee-communication-form</a>
<b>3.2. Supporting the Participation of the Stakeholders in the Corporation's Management</b>	
Name of the section on the corporate website that demonstrates the internal regulation addressing the participation of employees on management bodies	Corporate Governance Principles Compliance Report Section
Corporate bodies where employees are actually represented	At Türk Telekom, employees are represented through Occupational Health and Safety Boards and various surveys, research and individual notifications conducted by Human Resources. As of the end of 2023, the judicial process between the unions regarding the determination of the labor union authorized to conclude collective bargaining agreements at Türk Telekom is still ongoing. Therefore, the expired collective bargaining agreement continued to be implemented without any deterioration in employee rights. Türk Telekom has realised the necessary increases in the wages and rights of its employees, taking into account public and private sector collective bargaining agreements.

3.3. Human Resources Policy	
The role of the board on developing and ensuring that the company has a succession plan for the key management positions	<a href="https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy">https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy</a> <a href="https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-resources-policy">https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-resources-policy</a> <b>Human Resources Policy</b> In cases for executive position change might lead to disruptions in company management, backup plans are prepared for the determination of the new managers to be appointed.
The name of the section on the corporate website that demonstrates the human resource policy covering equal opportunities and hiring principles. Also provide a summary of relevant parts of the human resource policy.	<a href="https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy">https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy</a> <a href="https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-resources-policy">https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-resources-policy</a> <b>Employment Policy</b> Türk Telekom aims to recruit its employees on long term basis as a principal to provide high quality and economic services with regard to technological developments, financial and economic conditions and sectoral changes in its field of activity. Continuous success of Türk Telekom depends on the ab of its employees to adapt rapidly and efficiently to the changing conditions of the sector, as well as their flexibility this respect. Our employees via their superior skills, competence and experience help the Company to become one of the leading companies in the world. Türk Telekom supports on-the-job training by programmes carried in cooperation with regulatory and supervisory agencies a as the universities and provides employment opportunity within this framework. Our company asserts its claim of being the most preferred company to work for by sharing pride of being a Türk Telekom employee with young talents from universities and professionals outside the company. Recruitment criteria are determined and documented in written form and that criteria should be followed. Türk Telekom provides equal recruitment and career planning opportunity to its applicants. <b>Diversity</b> Türk Telekom values diversity and considers this is an asset, and strives to make its employees feel like the a part of the Company. Accordingly, Türk Telekom is committed to equal opportunity, and takes into account qualifications, performance, skills and experiences of it employees for recruitment, placement, development, training, compensation, promotion, and resignation from Company. Is aware that diversity in its labour contributing achievement of the Company targets, and strives to rec candidates with diverse backgrounds and experience, a employ them for a long term. Fulfils its legal obligations relation to employment of people with disabilities, and disadvantages.
Whether the company provides an employee stock ownership programme	There isn't an employee stock ownership programme
The name of the section on the corporate website that demonstrates the human resource policy covering discrimination and mistreatments and the measures to prevent them. Also provide a summary of relevant parts of the human resource policy.	<a href="https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy">https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy</a> <b>Discrimination and Harassment At Türk Telekom;</b> No one is discriminated on grounds of age, language, race, ethnicity, nationality, health, disability status, gender, marital status, religion and sect, political opinions, philosophical beliefs and faith. Discriminatory and unfair conducts are not tolerated. Employees are provided with a working environment, free from all kinds of ill-treatment, mobbing and harassment.
The number of definitive convictions the company is subject to in relation to health and safety measures	17
3.5. Ethical Rules and Social Responsibility	
The name of the section on the corporate website that demonstrates the code of ethics	<a href="https://www.ttyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies">https://www.ttyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies</a> <a href="https://www.ttyatirimciiliskileri.com.tr/media/h3rjq0xg/code-of-ethics.pdf">https://www.ttyatirimciiliskileri.com.tr/media/h3rjq0xg/code-of-ethics.pdf</a>
The name of the section on the company website that demonstrates the corporate social responsibility report. If such a report does not exist, provide the information about any measures taken on environmental, social and corporate governance issues.	<a href="https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/sustainability">https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/sustainability</a> <a href="https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/corporate-social-responsibility">https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/corporate-social-responsibility</a>
Any measures combating any kind of corruption including embezzlement and bribery	<a href="https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/policies">https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/policies</a> <a href="https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/anti-bribery-and-anti-corruption-policy">https://www.ttyatirimciiliskileri.com.tr/en-us/socially-responsible-investing/pages/anti-bribery-and-anti-corruption-policy</a>
4. BOARD OF DIRECTORS-I	
4.2. Activity of the Board of Directors	
Date of the last board evaluation conducted	-
Whether the board evaluation was externally facilitated	No
Whether all board members released from their duties at the GSM	Yes
Name(s) of the board member(s) with specific delegated duties and authorities, and descriptions of such duties	2 individuals jointly represent and bind our company in the broadest terms on all kind of matters as below: - Ümit Önal, Member of the Board of Directors nominated by Group A Shareholder

	- Dr. Ömer Fatih Sayan, Member of the Board of Directors representing Group C Privileged Share
Number of reports presented by internal auditors to the audit committee or any relevant committee to the board	Number of reports submitted to the Committee and Board of Directors is 4.
Specify the name of the section or page number of the annual report that provides the summary of the review of the effectiveness of internal controls	Assessments of the Board of Directors Section
Name of the Chairman	Dr. Ömer Fatih Sayan
Name of the CEO	Ümit Önal
If the CEO and Chair functions are combined: provide the link to the relevant PDP announcement providing the rationale for such combined roles	Not the same person.
Link to the PDP notification stating that any damage that may be caused by the members of the board of directors during the discharge of their duties is insured for an amount exceeding 25% of the company's capital	<a href="https://www.kap.org.tr/en/Bildirim/1156203">https://www.kap.org.tr/en/Bildirim/1156203</a>
The name of the section on the corporate website that demonstrates current diversity policy targeting women directors	<a href="https://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies">https://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies</a> <a href="https://www.tyatirimciliskileri.com.tr/media/jk4hizj2/women-board-membership-policy.pdf">https://www.tyatirimciliskileri.com.tr/media/jk4hizj2/women-board-membership-policy.pdf</a>
The number and ratio of female directors within the Board of Directors	0

#### Yönetim Kurulunun Yapısı (Özet)

Name, Surname of Board Member	Whether Executive Director Or Not	Whether Independent Director Or Not	The First Election Date To Board	Link To PDP Notification That Includes The Independency Declaration	Whether the Independent Director Considered By The Nomination Committee	Whether She/He is the Director Who Ceased to Satisfy The Independence or Not	Whether The Director Has At Least 5 Years' Experience On Audit, Accounting And/Or Finance Or Not
Dr. Ömer Fatih Sayan	Non-executive	Bağımsız üye değil.	04.09.2018	-	-	No	No
Yiğit Bulut	Non-executive	Independent director	06.05.2014	<a href="https://kap.org.tr/en/Bildirim/358251">https://kap.org.tr/en/Bildirim/358251</a>	Considered.	No	Yes
Selim Dursun	Non-executive	Independent director	04.09.2018	<a href="https://kap.org.tr/en/Bildirim/708083">https://kap.org.tr/en/Bildirim/708083</a>	Considered.	No	No
Enver İskurt	Non-executive	Independent director	31.03.2022	<a href="https://kap.org.tr/en/Bildirim/1014683">https://kap.org.tr/en/Bildirim/1014683</a>	Considered.	No	Yes
Salim Arda Ermut	Non-executive	Not independent director	31.03.2022	-	-	No	Yes
Ümit Önal	Executive	Not independent director	31.03.2022	-	-	No	Yes
Metin İlhan	Non-executive	Not independent director	31.03.2022	-	-	No	No
Deniz Yılmaz	Non-executive	Not independent director	09.08.2023	-	-	No	Yes

#### 4. Board of Directors-II

##### 4.4. Meeting Procedures of the Board of Directors

Number of physical or electronic board meetings in the reporting period	14
Director average attendance rate at board meetings	94.5%
Whether the board uses an electronic portal to support its work or not	No
Number of minimum days ahead of the board meeting to provide information to directors, as per the board charter	10 days

The name of the section on the corporate website that demonstrates information about the board charter	Article 12 of the Company's Articles of Association. <a href="https://www.tyatirimciiliskileri.com.tr/media/4ulbh4i1/articles_of_association_pdf">https://www.tyatirimciiliskileri.com.tr/media/4ulbh4i1/articles_of_association_pdf</a> <a href="http://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/articles-of-association-trade-registry-information.aspx">http://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/articles-of-association-trade-registry-information.aspx</a>			
Number of maximum external commitments for board members as per the policy covering the number of external duties held by directors	-			
<b>4.5. Board Committees-II</b>				
Page numbers or section names of the annual report where information about the board committees are presented	Board of Directors' Committees and Corporate Governance Principles Compliance Report Section			
Link(s) to the PDP announcement(s) with the board committee charters	Audit Committee: <a href="https://www.kap.org.tr/en/Bildirim/659174">https://www.kap.org.tr/en/Bildirim/659174</a> Nomination and Remuneration Committee: <a href="https://www.kap.org.tr/en/Bildirim/1038148">https://www.kap.org.tr/en/Bildirim/1038148</a> Early Identification and Management of Risks Committee <a href="https://www.kap.org.tr/en/Bildirim/304033">https://www.kap.org.tr/en/Bildirim/304033</a> Corporate Governance Committee: <a href="https://www.kap.org.tr/en/Bildirim/741628">https://www.kap.org.tr/en/Bildirim/741628</a>			
<b>Composition of Board Committees -I</b>				
<b>Names Of The Board Committees</b>	<b>Name Of Committees Defined As "Other" In The First Column</b>	<b>Name-Surname of Committee Members</b>	<b>Whether Committee Chair Or Not</b>	<b>Whether Board Member Or Not</b>
Corporate Governance Committee		Enver Iskurt	Yes	Board member
Corporate Governance Committee		Selim Dursun	No	Board member
Corporate Governance Committee		Metin İlhan	No	Board member
Corporate Governance Committee		Gülşen Ayaz	No	Not board member
Audit Committee		Yiğit Bulut	Yes	Board member
Audit Committee		Selim Dursun	No	Board member
Early Identification and Management of Risks Committee		Yiğit Bulut	Yes	Board member
Early Identification and Management of Risks Committee		Dr. Ömer Fatih Sayan	No	Board member
Nomination and Remuneration Committee		Yiğit Bulut	Yes	Board member
Nomination and Remuneration Committee		Dr. Ömer Fatih Sayan	No	Board member
Nomination and Remuneration Committee		Salim Arda Ermut	No	Board member
<b>4. Board of Directors-III</b>				
<b>4.5. Board Committees-II</b>				
Specify where the activities of the audit committee are presented in your annual report or website (Page number or section name in the annual report/website)	Annual Report / Corporate Governance Principles Compliance Report Section <a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/audit-committee">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/audit-committee</a>			
Specify where the activities of the corporate governance committee are presented in your annual report or website (Page number or section name in the annual report/website)	Annual Report / Corporate Governance Principles Compliance Report Section <a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-committee">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-committee</a>			
Specify where the activities of the nomination committee are presented in your annual report or website (Page number or section name in the annual report/website)	Annual Report / Corporate Governance Principles Compliance Report Section <a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/nomination-committee">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/nomination-committee</a>			
Specify where the activities of the early detection of risk committee are presented in your annual report or website (Page number or section name in the annual report/website)	Annual Report / Corporate Governance Principles Compliance Report Section <a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/early-identification-and-management-of-risks-and-committee">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/early-identification-and-management-of-risks-and-committee</a>			
Specify where the activities of the remuneration committee are presented in your annual report or website (Page number or section name in the annual report/website)	Annual Report / Corporate Governance Principles Compliance Report Section <a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/nomination-committee">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/nomination-committee</a>			

**4.6. 'Financial Right Provided to the Members of Board of Directors and the Senior Executives'**

Specify where the operational and financial targets and their achievement are presented in your annual report (Page number or section name in the annual report)	Annual Report / Corporate Governance Principles Report Section
Specify the section of website where remuneration policy for executive and non-executive directors are presented.	"Policies" section under the heading "Corporate Governance" on the Company's website at <a href="http://www.tyatirimciliskileri.com.tr">http://www.tyatirimciliskileri.com.tr</a> <a href="https://www.tyatirimciliskileri.com.tr/media/bf1go0g5/remuneration_policy.pdf">https://www.tyatirimciliskileri.com.tr/media/bf1go0g5/remuneration_policy.pdf</a>
Specify where the individual remuneration for board members and senior executives are presented in your annual report (Page number or section name in the annual report)	Annual Report / Corporate Governance Principles Report Section 'Financial Right Provided to the Members of Board of Directors to the Senior Executives'

**Composition of Board Committees -II**

<b>Names of the Board Committees</b>	<b>Name of committees defined as "Other" in the first column</b>	<b>The Percentage of Non-executive Directors</b>	<b>The Percentage of Independent Directors in the Committee</b>	<b>The Number of Meetings Held in Person</b>	<b>The Number of Re Activities Submit Board</b>
Audit Committee		100%	100%	5	6
Corporate Governance Committee		75%	50%	2	1
Early Identification and Management of Risks Committee		100%	50%	5	1
Nomination and Remuneration Committee		100%	33%	3	3

## Sustainability Principles Compliance Report

		COMPLIANCE STATUS				EXPLANATION	RELATED REPORT/LINK
		YES	NO	PARTIAL	IRRELEVANT		
<b>A. General Principles</b>							
<b>A1. Strategy, Policy and Goals</b>							
A1.1	The prioritised environmental, social and corporate governance (ESG) issues, risks and opportunities have been determined by the Company's Board of Directors.	X				Within the scope of corporate risk management, Environmental, Social, and Governance (ESG) risk areas are currently being monitored by the relevant departments within the Company. ESG policies are outlined in the Sustainability policy.	<a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/sustainability-policy">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/sustainability-policy</a>
	The ESG policies (Environmental Policy, Energy Policy, Human Rights and Employee Policy etc.) have been created and disclosed to the public by the Company's Board of Directors.	X				Human Rights Policy, Human Resources Policy, Anti-Bribery and Anti-Corruption Policy, Information Safety Policy, Procurement Policy, Integrated Management System Policy, Disclosure Policy, Dividend Policy, Remuneration Policy, Board of Directors Women Membership Policy, Donation Policy, Compensation Policy, Sustainability Policy, Code of Ethics  Investor Relations Web Site-Corporate Governance Policies <a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies</a> Work on the environmental policy for Türk Telekom and Group companies is in progress.	Investor Relations Web Site Sustainability-Policy ( <a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/sustainability-policy">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/sustainability-policy</a> )  Investor Relations Web Site-Corporate Governance Policies ( <a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies</a> )
A1.2	The short and long-term targets set within the scope of ESG policies have been disclosed to the public.	X				The Türk Telekom Group's Carbon Emission Reduction Commitment has been shared with the public through the Public Disclosure Platform.	<a href="https://www.kap.org.tr/en/Bildirim/1257319">https://www.kap.org.tr/en/Bildirim/1257319</a>
<b>A2. Implementation/Monitoring</b>							
A2.1	The responsible committees and/or business units for the implementation of ESG policies and the senior officials related to ESG issues in the Company and their duties have been identified and disclosed to the public.	X				It is shared in the Sustainability Committee Working Principles.	<a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/sustainability-committee">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/sustainability-committee</a>
	The activities carried out within the scope of policies by the responsible committee and/or unit have been reported to the Board of Directors at least once a year.	X				The business units responsible for policies have been identified and reporting is made when necessary within the scope of their duties.	
A2.2	In line with the ESG targets, the implementation and action plans have been formed and disclosed to the public.	X				ESG targets and approaches in this direction are included in the Sustainability Policy.	<a href="https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/sustainability-policy">https://www.tyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/sustainability-policy</a>
A2.3	The Key ESG Performance Indicators (KPI) and the level of reaching these indicators have been disclosed to the public on yearly basis.	X				It was disclosed in 2022 Sustainability Report.	2022 Sustainability Report <a href="https://www.tyatirimciiliskileri.com.tr/media/2u2oqxv0/en-turk-telekom-surdurulebilirlik-raporu-hrv3.pdf">https://www.tyatirimciiliskileri.com.tr/media/2u2oqxv0/en-turk-telekom-surdurulebilirlik-raporu-hrv3.pdf</a>
A2.4	The activities for improving the sustainability performance of the business processes or products and services have been disclosed to the public	X				In the Sustainability Report, activities to improve the sustainability performance of business processes or products and services are disclosed to the public.	2022 Sustainability Report:  Focus on Climate Change and Environment p.37  Focus on Customers p.50-59  Focus on Value for Human p.62-70  Focus on Trust-Doing Business Responsibly p.72-89

							Focus on Contributions to Society s.91-95
<b>A3. Reporting</b>							
A3.1	The information about the sustainability performance, targets and actions have been given in annual reports of the Company an understandable, accurate and sufficient manner.	X				It is disclosed in Our Sustainability Performance section of the Annual Report.	2023 Annual Report p.13
A3.2	The information about activities which are related to the United Nations (UN) 2030 Sustainable Development Goals have been disclosed to the public.	X				In the Sustainability Report, information on which of the United Nations (UN) 2030 Sustainable Development Goals our operations are related to is disclosed to the public.	2022 Sustainability Report p.25-26
A3.3	The lawsuits filed and/or concluded against the Company about ESG issues which are material in terms of ESG policies and/or will significantly affect the Company's activities, have been disclosed to the public.	X				It has been disclosed to the public that Türk Telekom did not have any environmental accidents reported or accrued environmental fines in 2022.	<a href="https://www.tyatirimciliskile.com.tr/en-us/socially-responsible-investing/pages/occupational-health-and-safety">https://www.tyatirimciliskile.com.tr/en-us/socially-responsible-investing/pages/occupational-health-and-safety</a>
<b>A4. Verification</b>							
A4.1	The Company's Key ESG Performance metrics have been verified by an independent third party and publicly disclosed.		X			The emission values resulting from Türk Telekom's activities in 2023 have not yet been finalized. When finalized, they will be verified and shared on the website.	
<b>B. Environmental Principles</b>							
B1	The policies and practices, action plans, environmental management systems (known by the ISO 14001 standard) and programs have been disclosed.	X				Türk Telekom operates within the scope of ISO 14001 Environmental Management System and ISO 45001 Occupational Health and Safety Management System. It is included in the Integrated Management System Policy.	<a href="https://www.tyatirimciliskile.com.tr/en-us/socially-responsible-investing/pages/integrated-management-system-policy">https://www.tyatirimciliskile.com.tr/en-us/socially-responsible-investing/pages/integrated-management-system-policy</a>
B2	The environmental reports prepared to provide information on environmental management have been disclosed to the public which is including the scope, reporting period, reporting date and limitations about the reporting conditions.	X				Information regarding environmental management is included in the 2022 Sustainability Report. Work is ongoing for the year 2023.	2022 Sustainability Report p.3
B4	The environmental targets within the scope of performance incentive systems which included in the rewarding criteria have been disclosed to the public on the basis of stakeholders (such as members of the Board of Directors, managers and employees).	X				Türk Telekom Group's Carbon Emission Reduction Commitment was disclosed to the public via PDP.	<a href="https://www.kap.org.tr/en/Bildirim/1257319">https://www.kap.org.tr/en/Bildirim/1257319</a>
B5	How the prioritised environmental issues have been integrated into business objectives and strategies has been disclosed.	X				It is explained in the Sustainability Policy.	<a href="https://www.tyatirimciliskile.com.tr/en-us/corporate-governance/pages/sustainability-policy">https://www.tyatirimciliskile.com.tr/en-us/corporate-governance/pages/sustainability-policy</a>
B7	The way of how environmental issues has been managed and integrated into business objectives and strategies throughout the Company's value chain, including the operational process, suppliers and customers has been disclosed.	X				It is explained in the Sustainability Policy and Procurement Policy.	<a href="https://www.tyatirimciliskile.com.tr/en-us/corporate-governance/pages/sustainability-policy">https://www.tyatirimciliskile.com.tr/en-us/corporate-governance/pages/sustainability-policy</a> <a href="https://www.tyatirimciliskile.com.tr/en-us/socially-responsible-investing/pages/procurement-policy">https://www.tyatirimciliskile.com.tr/en-us/socially-responsible-investing/pages/procurement-policy</a>
B8	Whether the Company have been involved to environmental related organizations and non-governmental organizations' policy making processes and collaborations with these organizations has been disclosed.	X				It is included in the Our Sustainability Performance section.	2023 Annual Report p.13
B9	In the light of environmental indicators (Greenhouse gas emissions (Scope-1 (Direct), Scope-2 (Energy indirect), Scope-3 (Other indirect), air quality, energy management, water and	X				CDP reporting is conducted. The CDP Report is available on the Investor Relations website.	<a href="https://www.tyatirimciliskile.com.tr/en-us/socially-responsible-investing/pages/carbon-disclosure-project">https://www.tyatirimciliskile.com.tr/en-us/socially-responsible-investing/pages/carbon-disclosure-project</a>

	wastewater management, waste management, biodiversity impacts)), information on environmental impacts is periodically disclosed to the public in a comparable manner.						
B10	Details of the standard, protocol, methodology, and baseline year used to collect and calculate data has been disclosed.	X				CDP reporting is conducted. The report for the year 2023 has not yet been completed.	<a href="https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/carbon-disclosure-project">https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/carbon-disclosure-project</a>
B11	The increase or decrease in Company's environmental indicators as of the reporting year has been comparatively disclosed with previous years.		X			Work is ongoing for the year 2023.	2022 Sustainability Report p.98
B12	The short and long-term targets for reducing the environmental impacts have been determined and the progress compared to previous years' targets has been disclosed.	X				In the Sustainability Report, short- and long-term targets have been set to reduce environmental impacts, and these targets and progress against the targets set in previous years are disclosed to the public. In addition, Türk Telekom Group's Carbon Emission Reduction Commitment was disclosed on the Public Disclosure Platform.	2022 Sustainability Report p.37-48 <a href="https://www.kap.org.tr/en/Bildirir/1257319">https://www.kap.org.tr/en/Bildirir/1257319</a>
B13	A strategy to combat the climate crisis has been created and the planned actions have been publicly disclosed.	X				It is explained in the Sustainability Policy.	<a href="https://www.tyaticimciliskile.com.tr/en-us/corporate-governance/pages/sustainability-policy">https://www.tyaticimciliskile.com.tr/en-us/corporate-governance/pages/sustainability-policy</a>
B14	The programs/procedures to prevent or minimize the potential negative impact of products and/or services on the environment have been established and disclosed.	X				It is explained in the Sustainability Policy.	<a href="https://www.tyaticimciliskile.com.tr/en-us/corporate-governance/pages/sustainability-policy">https://www.tyaticimciliskile.com.tr/en-us/corporate-governance/pages/sustainability-policy</a>
	The actions to reduce greenhouse gas emissions of third parties (suppliers, subcontractors, dealers, etc.) have been carried out and disclosed.		X			Our efforts to monitor supplier activities have started. In the coming period, management mechanisms will be established for emission monitoring of products during the procurement phase.	
B15	The environmental benefits/gains and cost savings of initiatives/projects that aims reducing environmental impacts have been disclosed.	X				Disclosed on Türk Telekom Investor Relations website. Work for 2023 reporting is ongoing.	<a href="https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/environmental-sustainability-and-efficiency">https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/environmental-sustainability-and-efficiency</a>
B16	The data related to energy consumption (natural gas, diesel, gasoline, LPG, coal, electricity, heating, cooling, etc.) has been disclosed as Scope-1 and Scope-2.	X				Energy consumption was disclosed to the public as Scope 1 and Scope 2 in the Report. Work for 2023 reporting is ongoing.	<a href="https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/carbon-disclosure-project">https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/carbon-disclosure-project</a>
B17	The information related to production of electricity, heat, steam and cooling as of the reporting year has been disclosed.			X		Information on electricity and fuel consumed was provided in the CDP report and 2022 Sustainability Report. Work for 2023 reporting is still in progress.	<a href="https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/carbon-disclosure-project">https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/carbon-disclosure-project</a>
B18	The studies related to increase the use of renewable energy and transition to zero/low carbon electricity have been conducted and disclosed.	X				It is disclosed in the Emission Management section of Türk Telekom Investor Relations website.	<a href="https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/emission-management">https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/emission-management</a>
B19	The renewable energy production and usage data has been publicly disclosed.	X				Renewable energy production and utilization data for 2022 has been made public.	2022 Sustainability Report p.98
B20	The Company conducted projects about energy efficiency and the amount of reduction on energy consumption and emission achieved through these projects have been disclosed.	X				It is disclosed in the Electricity Utilization and Management section of Türk Telekom Investor Relations website.	<a href="https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/electricity-use-and-management">https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/electricity-use-and-management</a>
B21	The water consumption, the amount, procedures and sources of recycled and discharged water from underground or above	X				It is disclosed in the Water Management section of Türk Telekom Investor Relations website.	<a href="https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/waste-management">https://www.tyaticimciliskile.com.tr/en-us/socially-responsible-investing/pages/waste-management</a>

	ground (if any), have been disclosed.						
B22	The information related to whether Company's operations or activities are included in any carbon pricing system (Emissions Trading System, Cap & Trade or Carbon Tax).				X	The Company's sector is not among the priority sectors.	2022 CDP Report <a href="https://www.tyatirimciiliskile ri.com.tr/media/znqazv54/cd p-2022.pdf">https://www.tyatirimciiliskile ri.com.tr/media/znqazv54/cd p-2022.pdf</a>
B23	The information related to accumulated or purchased carbon credits within the reporting period has been disclosed.		X			Work for 2023 reporting is ongoing.	
B24	If carbon pricing is applied within the Company, the details have been disclosed.				X	The Company's sector is not among the priority sectors.	2022 CDP Report <a href="https://www.tyatirimciiliskile ri.com.tr/media/znqazv54/cd p-2022.pdf">https://www.tyatirimciiliskile ri.com.tr/media/znqazv54/cd p-2022.pdf</a>
B25	The platforms where the Company discloses its environmental information have been disclosed.	X				It is available on the Türk Telekom Investor Relations website.	2022 CDP Report <a href="https://www.tyatirimciiliskile ri.com.tr/media/znqazv54/cd p-2022.pdf">https://www.tyatirimciiliskile ri.com.tr/media/znqazv54/cd p-2022.pdf</a>
<b>C. Social Principles</b>							
<b>C1. Human Rights and Employee Rights</b>							
C1.1	The Institutional Human Rights and Employee Rights Policy has been established in the light of the Universal Declaration of Human Rights, ILO Conventions ratified by Turkey and other relevant legislation. The policy and the officials that responsible for the implementation of it have been determined and disclosed.	X				The policy on Human Rights and the processes for its implementation have been disclosed to the public.	<a href="https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy">https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy</a>
C1.2	Considering the effects of supply and value chain, fair workforce, improvement of labor standards, women's employment and inclusion issues (gender, race, religion, language, marital status, ethnic identity, sexual orientation, gender identity, family responsibilities, union activities, political opinion, disability, social and cultural differences, etc., such as non-discrimination) are included in its policy on employee rights.	X				It is included in the Company's Human Rights Policy.	<a href="https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy">https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy</a>
C1.3	The measures taken for the minority rights/equality of opportunity or the ones who are sensitive about certain economic, environmental, social factors (low income groups, women, etc.) along the supply chain have been disclosed.	X				Under the heading of ACCEPTING DIFFERENCES in the Human Rights Policy; "Türk Telekom values differences, sees this as a richness and strives to make its employees feel themselves as a part of the Company." Accordingly, it complies with legal obligations regarding the employment of disabled and disadvantaged people." In addition, important developments related to corporate social responsibility issues are included in the annual report.	<a href="https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy">https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy</a>
C1.4	The developments regarding preventive and corrective practices against discrimination, inequality, human rights violations, forced and child labor have been disclosed.	X				It is included in the Company's Human Rights Policy.	<a href="https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy">https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy</a>
C1.5	Investments in employees (education, development policies), compensation, fringe benefits, right to unionize, work/life balance solutions and talent management are included in the employee rights policy.	X				Investments in employees are included in the Human Resources Policy.	<a href="https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy">https://www.tyatirimciiliskile ri.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy</a>
	The mechanism for employee complaints and resolution of disputes have been established and related solution processes have been determined.	X				The processes are explained in detail in the Company's Code of Ethics. Information on these issues is also provided in the Stakeholders section of the Annual Report.	<a href="https://www.tyatirimciiliskile ri.com.tr/media/h3rjq0xg/code-of-ethics.pdf">https://www.tyatirimciiliskile ri.com.tr/media/h3rjq0xg/code-of-ethics.pdf</a>

	The activities carried out within the reporting period which related to ensure employee satisfaction have been disclosed.	X				The Human Resources Policy and Employment section of the Sustainability Report includes information on this issue. Work for 2023 reporting is ongoing.	2022 Sustainability Report p.63
C1.6	The occupational health and safety policies have been established and disclosed.	X				There is an Integrated Management System Policy. It is published on the Company's Investor Relations website.	<a href="https://www.tyatirimciiliskile.com.tr/en-us/socially-responsible-investing/pages/integrated-management-system-policy">https://www.tyatirimciiliskile.com.tr/en-us/socially-responsible-investing/pages/integrated-management-system-policy</a>
	The measures taken for protecting health, preventing occupational accidents and related statistics have been disclosed.	X				It is included in the sustainability report. Work for 2023 reporting is ongoing.	2022 Sustainability Report p.70
C1.7	The personal data protection and data security policies have been established and disclosed.	X				Information on this issue is available in the Human Rights Policy and on the Company's Investor Relations website.	<a href="https://www.tyatirimciiliskile.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy">https://www.tyatirimciiliskile.com.tr/en-us/socially-responsible-investing/pages/human-rights-policy</a>
C1.8	The ethics policy have been established and disclosed.	X				The Code of Ethics is shared with the public on the Investor Relations page.	<a href="https://www.tyatirimciiliskile.com.tr/media/h3rjq0xc/code-of-ethics.pdf">https://www.tyatirimciiliskile.com.tr/media/h3rjq0xc/code-of-ethics.pdf</a>
C1.9	The studies related to social investment, social responsibility, financial inclusivity and access to finance have been explained.	X				It is disclosed in the Corporate Social Responsibility section of Türk Telekom Investor Relations website.	<a href="https://www.tyatirimciiliskile.com.tr/en-us/socially-responsible-investing/pages/corporate-social-responsibility">https://www.tyatirimciiliskile.com.tr/en-us/socially-responsible-investing/pages/corporate-social-responsibility</a>
C1.10	The informative meetings and training programs related to ESG policies and practices have been organized for employees.	X				The company regularly organizes trainings every year on waste management, water conservation, energy efficiency, occupational health and safety legislation, and hygiene training. In 2023, 16,883 employees received online environmental training.	2022 Sustainability Report p.101 <a href="https://www.tyatirimciiliskile.com.tr/media/2u2oqxv0/en-turk-telekom-surdurulebilirlik-raporu-h-rv3.pdf">https://www.tyatirimciiliskile.com.tr/media/2u2oqxv0/en-turk-telekom-surdurulebilirlik-raporu-h-rv3.pdf</a>
<b>C2. Stakeholders, International Standards and Initiatives</b>							
C2.1	The customer satisfaction policy regarding the management and resolution of customer complaints has been prepared and disclosed.			X		Customer satisfaction policy preparations are in progress.	
C2.2	The information about the communication with stakeholders (which stakeholder, subject and frequency) have been disclosed.			X		Work for 2023 reporting is ongoing.	
C2.3	The international reporting standards that adopted in reporting have been explained.	X				International standards adopted in previous periods are included in the Sustainability Report. Work for 2023 reporting is ongoing.	2022 Sustainability Report p.3,35
C2.4	The principles adopted regarding sustainability, the signatory or member international organizations, committees and principles have been disclosed.	X				Türk Telekom has been a participating member of UNGC since 2020. The principles adopted regarding sustainability, signatory or member organizations are disclosed to the public.	<a href="https://www.tyatirimciiliskile.com.tr/media/24lfxwx/investor-call-q3-23.pdf">https://www.tyatirimciiliskile.com.tr/media/24lfxwx/investor-call-q3-23.pdf</a>
C2.5	The improvements have been made and studies have been carried out in order to be included in the Borsa Istanbul sustainability indices and/or international index providers.	X				Türk Telekom Borsa Istanbul Sustainability Index, MSCI, S&P Global, Sustainalytics, Vigeo Eiris and FTSE4Good Indices and platforms are included in Türk Telekom Investor Relations Investor Presentation.	<a href="https://www.tyatirimciiliskile.com.tr/media/24lfxwx/investor-call-q3-23.pdf">https://www.tyatirimciiliskile.com.tr/media/24lfxwx/investor-call-q3-23.pdf</a>
<b>D. Corporate Governance Principles</b>							
D1	The opinions of stakeholders have been sought in the determination of measures and strategies related to sustainability field.	X				Stakeholders' opinions were consulted in determining sustainability measures and strategies in the Sustainability Report. Work for 2023 reporting is ongoing.	2022 Sustainability Report p.28
D2	The social responsibility projects, awareness activities and trainings have been carried out to raise awareness about sustainability and its importance.	X				Social responsibility projects, awareness-raising events and trainings were carried out to raise awareness on sustainability and its importance.	<a href="https://medya.turktelekom.com.tr/basin-bultenleri/basin-bultenleri-ve-gorseller">https://medya.turktelekom.com.tr/basin-bultenleri/basin-bultenleri-ve-gorseller</a>