

INVEO YATIRIM HOLDİNG AŞ STAKEHOLDERS POLICY

1. PURPOSE

The purpose of this Policy is to regulate the principles of corporate policy regarding stakeholders in accordance with the Capital Markets Law No. 6362 and the Corporate Governance Communiqué (II-17.1).

2. SCOPE

This policy covers as stakeholder, persons, institutions or interest groups related to the activities of the Institution such as shareholders, debt instrument holders, employees, suppliers, public institutions, industry and non-governmental organizations and potential savers who may consider investing.

3. PROVISION

This policy has been prepared in accordance with the Corporate Governance Communiqué (II-17.1).

4. DEFINITIONS

In this policy the terms used are as follows;

Law: Capital Market Law No. 6362

Board: Capital Markets Board of Türkiye

Stakeholders: Persons, institutions or interest groups such as shareholders, debt instrument holders, employees, suppliers, public institutions, industry and non-governmental organizations and potential savers who may consider investing in our Institution who have an interest in achieving the company's goals or activities,

Shareholders: Inveo Yatırım Holding AŞ (Inveo Yatırım Holding) refers to the persons who have become a partner of Inveo Yatırım Holding by purchasing their shares on Borsa İstanbul AŞ.

5. RESPONSIBILITY

As all units will comply with this policy, they will pay maximum attention to improving the relations with stakeholders within the scope of their business areas in accordance with the relevant articles of the Corporate Governance Communiqué published by the Board.

6. PROCESS STEPS AND APPLICATION

6.1. GENERAL PROVISIONS

The stakeholders are the persons, institutions or interest groups who are effective in the Company reaching its targets and have an interest in its activities. Within this framework, our stakeholders are determined as our Company's shareholders, employees, customers, suppliers, public institutions, sector and non-governmental institutions and prospective investors.

6.2. PROTECTION OF STAKEHOLDERS

The relationship between the stakeholders and our Company is governed by written contracts to the most possible extent.

The Company, in its transactions and operations, protects its stakeholders' rights regulated by the legislation and the mutual contracts. In case of detecting a violation of stakeholders' rights

which are protected by legislation and contracts, our Company effectively and immediately takes corrective actions in order to ensure their rights.

In cases where stakeholders' rights are not regulated by legislation and/or contracts, stakeholders' interests are protected by good-faith principle by also taking the Company's rights, capabilities and reputation into consideration. Our Company plays a leading role in the resolution of disputes that may occur between our Company and the stakeholders. If a conflict of interest occurs between the stakeholders, or a stakeholder is involved in more than one interest group, a fair policy is employed with respect to protection of rights and with the aim of protecting each right independently of one another.

6.3 DISCLOSURE TO STAKEHOLDERS

During the process of disclosure to the shareholders and stakeholders, our Company adopts a policy within the scope of equality, impartiality, consistency and timing principles. Within this context the announcements and statements are made in a timely, accurate, complete, comprehensible and easily accessible manner, taking the Company's rights and interests into account.

Our stakeholders are informed by means of material event disclosures, minutes of General Assembly meetings, annual and interim reports and financial reports published on Public Disclosure Platform and the Company website, and employees, they are informed through the announcements and regulations of the Human Resources Directorate.

The employees are informed about the issues relating to Company's targets and activities via the assessment and information meetings that are made within the scope of an open communication understanding.

6.4 PARTICIPATION OF STAKEHOLDERS IN MANAGEMENT

There are no regulations in our Company's Articles of Association regarding the participation of stakeholders to management. On the other hand, there are independent members in the Board of Directors who serve in order to ensure that, minority shareholders' and other stakeholders' rights are considered equally when taking resolutions.

Via the Customer Satisfaction Survey, the expectations of the employees on the company and management are obtained, and their suggestions on the improvement of the working conditions are evaluated. Additionally, the suggestions of the employees are obtained during the internal communications and briefing meetings in relation to improving the working conditions.

In the weekly coordination meetings; the opinions of all mid-level and high-level managers are obtained and assessed during the decision making process of the company. Several meetings are held with customers, suppliers, unions, prospective and current investors.

The protection of our shareholders' participation in the management is effected with the relevant laws and articles of association.

6.5 POLICY ON HUMAN RESOURCES

The rights and obligations of the employees of the institution, the working conditions are determined within the framework of the Human Resources Policy adopted by the Decision of the Board of Directors. The Human Resources Policy of our institution is located on the Company's website.

6.6 RELATIONS WITH SUPPLIERS

Our Company pays attention to the confidentiality of the customers' and suppliers' trade secrets. The necessary measures have been taken to set up good relationships with the customers and suppliers avoiding unfair competition and to act in accordance with the contracts that are in place between the parties; and our sensitivity in this respect has been communicated to all our employees and a common company awareness has been created.