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**ANNUAL REPORT
2020**

Türk Telekom
Değerli Hissettirir



CORPORATE GOVERNANCE PRINCIPLES 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 Turkey ("CMB"). The Company updates its annual and interim activity reports and corporate website, and makes them available to its shareholders to meet 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 Department.

On 14 December 2020, the corporate governance rating assessment report of Türk Telekom was prepared by SAHA Kurumsal Yönetim ve Kredi Derecelendirme Hizmetleri A.Ş. (SAHA A.Ş.), which holds an operating license to perform rating assessment in Turkey in line with the CMB's 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 undertaken 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:

Sub Categories	Weight	Rating
Shareholders	25%	87.59
Public Disclosure & Transparency	25%	98.85
Stakeholders	15%	99.51
Board of Directors	35%	92.83
Total	100%	94.03

The rating of 9.40 assigned by SAHA A.Ş 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 Corporate Governance Principles

Pursuant to the Communiqué No: II-17.1 dated 3 January 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 in shareholders

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

Non-presence of an article in the Articles of Association regarding the procedures for the invitation of Board of Directors for a meeting by shareholders and stakeholders

Pursuant to the New Turkish Commercial Code numbered 6102, which entered into force on 1 July 2012, each Board Member may submit a written request to the Chairman of the Board to invite the members of Board of Directors for a meeting.

Furthermore, shareholders holding 5% of the shares have the right to ask the Board of Directors to call a General Assembly Meeting by stating the reasons for doing so and the agenda for the meeting in written form, and also insert additional topics onto the agenda in the event that a General Assembly Meeting is to be convened anyway.

There is no other method of invitation of Board of Directors for a meeting.

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 scope of the Company's internal directives. Models for the participation of the Company's employees in the management, such as the Occupational Health and Safety Boards, Disciplinary Boards, the Dispute Resolutions Board and the Inventors' Idea System are being developed.

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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.

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 assessments of Board of Directors have been conducted to evaluate whether the Board of Directors have fulfilled their responsibilities effectively

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

Shareholders

Investor Relations Department

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 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, 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 timely, equally, 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 best introduction of the Company and providing necessary information to ensure 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; updating the investor relations website regularly to ensure that shareholders have access to accurate and complete information,
- Keeping investors regularly informed of Türk Telekom and the 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 the Türk Telekom shares which are publicly traded on the Borsa İstanbul.

Please contact the Corporate Governance and Compliance Manager, Eren Öner, for questions related to dividends, voting on General Assembly or transfer of shares.

The Department received over a thousand requests for information by telephone and email during 2020 and all these inquiries were responded to.

In 2020, investor conferences held with a number of countries in particular with the USA and the UK, were moved to online platforms due to the pandemic. Even in this difficult period, Türk Telekom maintained the close relationship with its investors and had a very active year in 2020. During 2020, the Company attended conferences, 2 of which were physical and 13 were online. In addition to that, the Company organised 5 virtual non-deal roadshows and 2 deal-roadshows regarding TL bond issuance. If one-on-one investor meetings are also included, Türk Telekom met with more than 370 equity and bond investors throughout the year.

Employees of Investor Relations Department

Name and Last Name	Job Title
Gülşen Ayaz	Director
Eren Öner	Manager
Nergis Gündoğdu	Manager
Gaye Yalçın	Expert
Selin Akar	Senior Associate
Tuğçe Cengiz	Assistant Associate
Hazal Koçoğlu	Assistant Associate

Phone: +90 212 309 96 30

E-mail: investorrelations@turktelekom.com.tr

Shareholders' Exercise of their 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 Department by letter, telephone, email or other means are answered to 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.ttyatirimciliskileri.com.tr 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 2020 were provided by KPMG Bağımsız Denetim ve Serbest Mali Müşavirlik A.Ş..

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 2020 and no special audit was conducted. On the other hand, the Company is subject to the audit and inquiry of the Information and Communications Technologies Authority, the Capital Markets Board of Turkey and the Competition Authority within the scope of the relevant legislation of the sector. 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 accordance with the 438th and 439th articles 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.

Article 19 of the Articles of Association stipulates, "The General Assembly shall be the main decision body of the Company, possessing every kind of authority in relation to the business of the Company provided by law". Article 21 of the Articles of Association lists the "Material Decisions to be adopted by the General Assembly" as follows and a special quorum has been stipulated for these decisions:

- the presentation of any petition for winding-up;
- any change to these Articles of Association;
- any change in the corporate name of the Company;
- any change to the accounting reference date or accounting policies, other than as required by law;

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e. any change in the share capital or the creation, allotment or issue of any shares, or of any other security or the grant of any option rights or rights to subscribe to the capital, or to convert any instrument into such shares or securities other than bonus shares;

f. any reduction of capital or variation of the rights attached to any class of shares or any redemption, purchase or other acquisition by the Company of any shares or other securities of that company;

g. any merger with or material acquisition of any other company;

h. the cessation of any major Business operation;

i. any material changes to the nature of its Business;

j. the payment or declaration by the Company of any dividend or distribution of any other kind relating to the shares other than in accordance with Article 30;

k. decisions on any of the matters referred to in Article 12 (a) to (f) above to the extent that such matters have not been approved in accordance with Article 12:

- the entry into of any contract or commitment not provided for in the Budget under which the Group Company may incur costs (per transaction) of more than USD 50 million;
- the acquisition of any assets or property (other than in the ordinary course of business) at a total cost (per transaction) of more than USD 50 million;
- the sale or disposition of any fixed assets for a total price per transaction of more than USD 10 million;
- the borrowing of amounts by a Group Company which when aggregated with all other borrowings of that Group Company would exceed USD 150 million, except for the loans obtained from banks in the ordinary course of business;
- entering into any agreement (other than any management agreement referred to in Article 12(g) below) between a Group Company and a Shareholder (other than the holder of the Group B Shares) or its Associates which (x) is not at arm's length terms or (y) involves the transfer of monies or goods and services of a value greater than USD 30 million;
- the appointment of any representative to act for the Company at any general assembly meeting of any Group Company (other than the Company and AVEA);

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 1527th of Turkish Commercial Code.

2020 General Assembly Meetings

On 25 July 2020, 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 92.91% of the Company shares were represented. During this meeting, no questions were raised by shareholders or their proxies attending either through the electronic platform or individually. Minutes of the Meeting can be accessed from <http://www.ttyatirimciliskileri.com.tr/en-us/corporate-governance/pages/general-assembly-meeting.aspx>. 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 25 July 2020 were registered by Ankara Trade Registry Directorate on 5 August 2020, and were published in the Turkish Trade Registry Gazette dated 6 August 2020.

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 414 of the Turkish Commercial Code, 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 www.ttinvestorrelations.com, 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.

In line with the donation policy of the Company, total donations in a fiscal year cannot exceed TL 40 million. In the Ordinary General Assembly Meeting held on 25 July 2020, the shareholders were informed of donations including education, health, sport, culture, the arts or humanitarian aid undertaken by the Company to associations and charitable institutions, which totalled TL 36,467,085 in the year 2019. Total donations and humanitarian aid made in 2020 amounted to TL 61,571,359. With the awareness of social responsibility, our company donated to support measures to mitigate the effects of Covid-19 in 2020.

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 2020.

The Company's Class A shares held by LYY Telekomünikasyon A.Ş. and Class C shares held by the Ministry of Treasury and Finance of the Republic of Turkey 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 C Group Privileged Share appoints one member representing the Privileged Share to the Board of Directors of Türk Telekom. The C Group 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.

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Company's "Dividend Distribution Policy" is disclosed to the public through investor relations website (www.ttinvestorrelations.com) and stated in Company's Annual Report.

In the Board of Directors meeting held on 3 July 2020, it was decided that a total gross amount of TL 601,650,000.00 which corresponds to approximately 25% of the Company's net distributable profit pertaining to year 2019 shall be distributed from 2019 net year profit, the withholding tax deductions shall be applicable within the scope of relevant regulations on the distribution date. In this context, it was decided to submit the proposal to distribute 0.17190 Kuruş (17.19%) gross cash dividend per each share worth for 1 Kuruş nominally to our shareholders, total gross cash dividend distribution amount to be TL 601,650,000.00 and 28 July 2020 to be the date to start the distribution of the cash dividend, for the approval of the General Assembly of the company. The proposal of the Board of Directors for dividend distribution was accepted in the general assembly meeting held on 25 July 2020. The distribution of the cash dividends to our shareholders took place between 28 July 2020 - 4 August 2020.

The Company did not buy back its shares in 2020.

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 formulated 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 12 April 2018 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 28 May 2018. The disclosure policy is posted on the investor relations website (www.ttinvestorrelations.com)

under the “Corporate Governance” heading. The Investor Relations 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.

2020 Company Guidance

On 13 May 2020 and 4 November 2020, the Company revised the guidance for 2020, which was announced on 12 February 2020.

Guidance for 2020 Regarding Consolidated Financial Results announced on 12 February 2020 is as follows:

Under current circumstances, guidance for 2020 is as below:

- Consolidated revenue growth (excluding IFRIC 12) to be around 14% level over 2019,
- Consolidated EBITDA to be around TL 12.4 billion level,
- Consolidated CAPEX to be around TL 5.8 billion level.

Explanations related to the 2020 guidance revision made on 13 May 2020 are as follows:

Under current circumstances, guidance for 2020 is as below;

- Consolidated revenue growth (excluding IFRIC 12) to be around 13% over 2019,
- Consolidated EBITDA to be at TL 12.4 billion and 12.6 billion levels,
- Consolidated CAPEX to be around TL 6.4 billion level.

Explanations related to the 2020 guidance revision made on 4 November 2020 are as follows:

Under the current circumstances, the guidance for 2020 is as below;

- Consolidated revenue growth (excluding IFRIC 12) to be around 16% over 2019,
- Consolidated EBITDA to be around TL 13.0 billion level,
- Consolidated CAPEX to be around TL 6.6 billion level.

Realisation of 2020

While the consolidated revenue (excluding IFRIC 12) increased by 17% slightly higher than the Company’s annual revenue growth guidance, the EBITDA recorded as TL 13.2 billion compared to the latest guidance of

TL 13.0 bn. During the same period, the Group invested TL 6.7 billion, slightly higher than the consolidated CAPEX guidance.

Guidance for 2021 Consolidated Financial Results

Under the current circumstances 2021 guidance is as follows:

- Consolidated revenue growth (excluding IFRIC 12) to be around 14% over 2020,
- Consolidated EBITDA to be around TL 15 billion level,
- Consolidated CAPEX to be around TL 7.7 billion level.

The Investor Relations Website and its Content

The Investor Relations website can be accessed from www.ttinvestorrelations.com, 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
- 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

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- Agenda
- Information set
- Meeting Minutes
- List of attendants
- Proxy sample
- 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
- 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

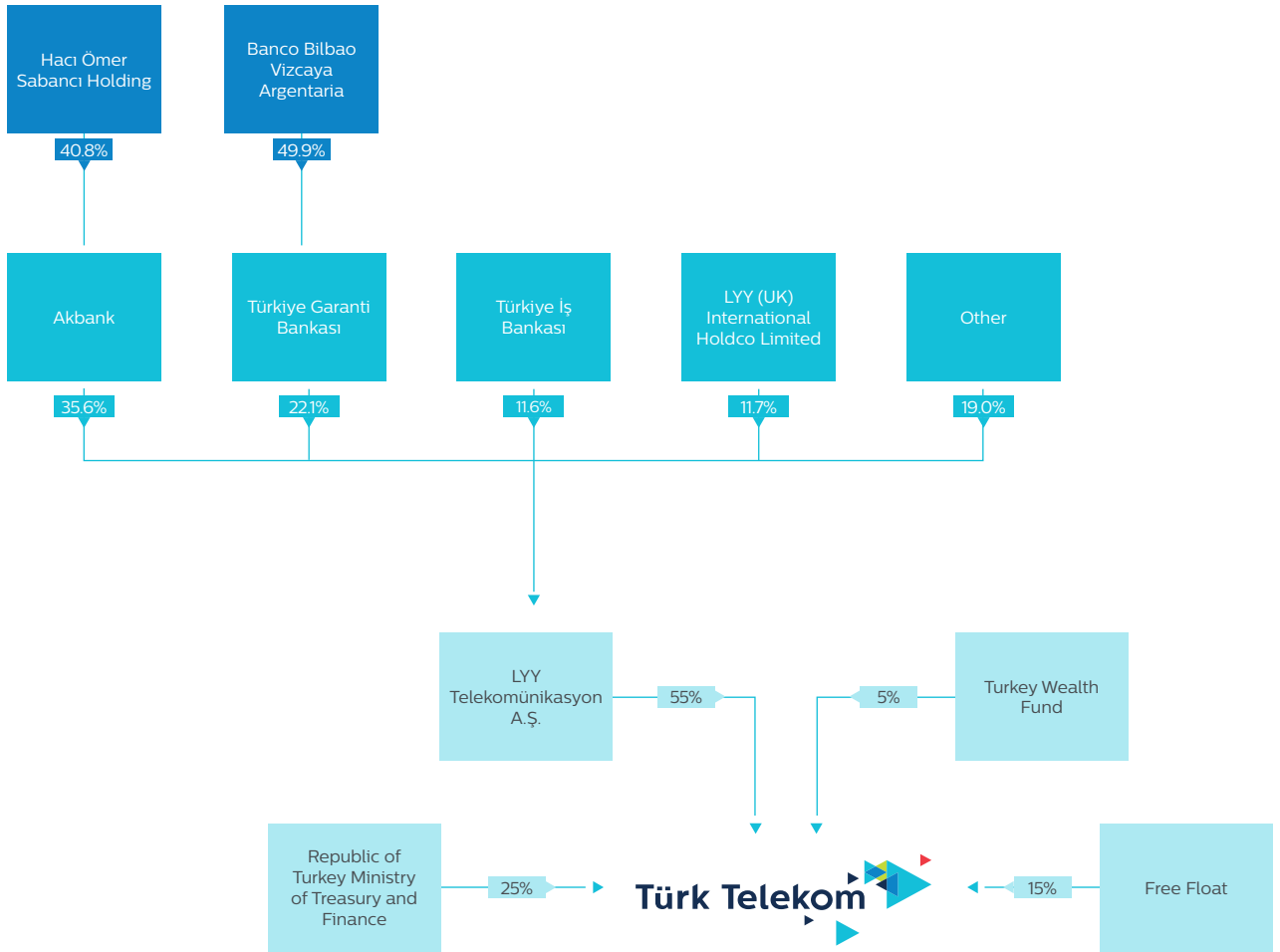
Not subject to the registered capital system, the Company has a share capital of TL 3,500,000,000 which is fully paid-in.

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

Shareholders	Share in Capital		
	Amount (TL)	Group	Share (%)
LYY Telekomünikasyon A.Ş.	1,925,000,000.00	A	55
Republic of Turkey Ministry of Treasury and Finance	875,011,884.975	B	25
Republic of Turkey Ministry of Treasury and Finance	0.01	C	
Turkish Wealth Fund	174,988,115.015	B	5
Free Float	525,000,000.00	D	15
TOTAL	3,500,000,000.00		100

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 Turkey Ministry of Treasury and Finance to the Turkish Wealth Fund. The share transfer transaction was completed in 2017.

Real and legal persons owning shares directly and indirectly in the Company are as follows:



Note: 1) There is no real or legal person whose shareholding exceeds 5% except those shown in the shareholder structure.

2) Turkey Wealth Fund has 1.68% share in free float.

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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 activity.

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 25 January 2019, Article 8 of the Articles of Association of the Company, entitled "Board of Directors" was amended and the number of the members of the Board of Directors was set at nine, and members of the Board of Directors were elected for a term of 3 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 B Group shares and D Group 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 C Group 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:

Türk Telekomünikasyon A.Ş. Members of the Board of Directors			
Name - Surname	Date of First Appointment to the Board of Directors	Duties at Türk Telekomünikasyon A.Ş. Over the Last Five Years	Duties Outside Türk Telekomünikasyon A.Ş.
Dr. Ömer Fatih Sayan	Chairman of the Board - 21.12.2018 Board Member - 04.09.2018		<ul style="list-style-type: none"> Deputy Minister at the Ministry of Transport and Infrastructure of the Republic of Turkey
Eyüp Engin	21.12.2018	<ul style="list-style-type: none"> 28.12.2018-Still: Board Member of TT Mobil İletişim Hizmetleri A.Ş. 28.12.2018-Still: Board Member of TTNET A.Ş. 28.12.2018-Still: Chairman of the Board of Argela Yazılım ve Bilişim Teknolojileri San. ve Tic. A.Ş. 	<ul style="list-style-type: none"> Akbank T.A.Ş. Executive Board Member, Responsible for Internal Systems Akbank T.A.Ş. Chairman of the Audit Committee
Yiğit Bulut	06.05.2014		<ul style="list-style-type: none"> Chief Advisor to the President of the Republic of Turkey Member of the Economy Policies Committee of the Presidency of the Republic of Turkey
Can Yücel	01.06.2020	<ul style="list-style-type: none"> 01.06.2020-Still: Board Member of TT Mobil İletişim Hizmetleri A.Ş. 01.06.2020-Still: Board Member of TTNET A.Ş. 11.09.2020-Still: Board Member of AssisTT Rehberlik ve Müşteri Hizmetleri A.Ş. 11.09.2020-Still: Board Member of İnnova Bilişim Çözümleri A.Ş. 11.09.2020-Still: Chairman of the Board of SEBİT Eğitim ve Bilişim Teknolojileri A.Ş. 	<ul style="list-style-type: none"> T. İş Bankası A.Ş. Başkent Corporate Branch Manager Board Memberships in subsidiary companies of T. İş Bankası
Selim Dursun	04.09.2018		<ul style="list-style-type: none"> Deputy Minister at the Ministry of Transport and Infrastructure of the Republic of Turkey
Dr. Nureddin Nebati	Group B - 27.12.2018 Group A - 02.11.2018		<ul style="list-style-type: none"> Deputy Minister at the Ministry of Treasury and Finance of the Republic of Turkey

CORPORATE GOVERNANCE PRINCIPLES COMPLIANCE REPORT

Türk Telekomünikasyon A.Ş. Members of the Board of Directors

Name - Surname	Date of First Appointment to the Board of Directors	Duties at Türk Telekomünikasyon A.Ş. Over the Last Five Years	Duties Outside Türk Telekomünikasyon A.Ş.
Dr. Muammer Cüneyt Sezgin	21.12.2018	<ul style="list-style-type: none"> 28.12.2018-Still: Deputy Chairman of TT Mobil İletişim Hizmetleri A.Ş. 28.12.2018-Still: Board Member of TTNET A.Ş. 28.12.2018-Still: Chairman of the Board of Türk Telekom International Group 	<ul style="list-style-type: none"> Board Member of Garanti BBVA. Board Member of Garanti BBVA Romania S.A. Head of the Audit Committee of Garanti BBVA Romania S.A. Board Member of Garanti BBVA Emeklilik Head of the Audit Committee of Garanti BBVA Emeklilik Board Member of Garanti BBVA Yatırım Head of the Audit Committee of Garanti BBVA Yatırım Member of the Board of Trustees of Teachers Academy Foundation Member of the Board of Trustees of World Wildlife Fund (WWF Turkey) Member of the Board of Trustees of Kabataş Boys' High School Education Foundation Member of the Board of the Turkish Finance Managers' Foundations Board Member of Turkish Corporate Governance Association
Aclan Acar	07.03.2019		<ul style="list-style-type: none"> Global Exchange Foreign Exchange Trade Authorised Corporation-Consultant TKYD - Member of the Corporate Governance Association of Turkey TÜYİD - Investor Relations Association Member YYKD - Member of the Women on Board Association Turkey Member of the Advisory Board of Turkish Education Foundation (TED) Member of the Board of Trustees of TED University Member of the Board of Trustees of TED İstanbul College
Ertuğrul Altın	12.03.2019		<ul style="list-style-type: none"> Advisor to the Minister at Ministry of Treasury and Finance of the Republic of Turkey Board Member of Boru Hatları İle Petrol Taşıma A.Ş.

Members of the Board of Directors were elected at the General Assembly dated 25.01.2019. 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.

There are no executive Board Members in the Company.

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 10th article of the Articles of Association, the members of the Board of Directors shall hold office for a term of 3 years.

In line with the Capital Markets Board legislation, the Corporate Governance Committee performed the member nomination responsibility of the Nomination Committee for the designation of the independent members of the Board of Directors whose nominations were discussed and decided at the Extraordinary General Assembly Meeting, which was held on 25 January 2019. B Group shareholders presented three independent board nominee members to the Corporate Governance Committee, and the Corporate Governance Committee prepared a report dated 4 January 2019 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. The term of office of the said Independent Members of the Board of Directors will expire on 25 January 2022.

Statements of Independence that each independent Board Member have signed are presented in the appendix of this report. No circumstances were found which could jeopardize 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 Board of Directors outside the Company.

Changes in the Members of the Board of Directors in 2020

On 1 June 2020, Board Member Hakan Aran resigned from his position, and Can Yücel was appointed as Board Member on 1 June 2020 for the Board Membership position that became vacant upon the resignation of Hakan Aran. Board Member status of Can Yücel was approved by the General Assembly in the Ordinary General Assembly Meeting held on 25 July 2020 to be valid under the same terms and conditions of the other Board Members and for the remaining term of office of his predecessor.

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 10 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 2020, the Company's Board of Directors convened 12 times in total to evaluate the strategic matters concerning the Company. The overall attendance rate of board members to the meetings was 96.3%. Pursuant to the 12th article 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 Turkey. 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 11 January 2019, 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.

CORPORATE GOVERNANCE PRINCIPLES COMPLIANCE REPORT

The Committee holds meetings at least once every three months. The Audit Committee gathered five times in 2020 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 11 January 2019, Independent Board Member Nureddin Nebati was appointed as Chairman of the Corporate Governance Committee, and Independent Board Member Selim Dursun and Board Member Dr. Muammer Cüneyt Sezgin were elected as members of the Corporate Governance Committee. Instead of Sabriye Gözde Çullas, who resigned from the committee on 30 June 2020, Investor Relations Director Gülsen Ayaz was appointed as a member of the Corporate Governance Committee on 11 September 2020.

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 2020, the Corporate Governance Committee held two meetings and carried out its tasks effectively.

Nomination Committee

Independent Board Member Dr. Nureddin Nebati serves as the Chairman of the Nomination Committee, established with the resolution issued by the Company's Board of Directors on 16 December 2019, while Chairman of the Board of Directors Dr. Ömer Fatih Sayan and Board Member Aclan Acar serve as members of the Nomination Committee.

Nomination Committee convenes at the frequency required by the tasks assigned to it, provided that such frequency shall not be less than 2 meetings per year. In 2020, the Committee held one meeting and carried out its tasks effectively.

Remuneration Committee

Independent Board Member Yiğit Bulut is serving as Chairman of the Remuneration Committee established with the resolution issued by the Company's Board of Directors on 16 December 2019, while Vice Chairman of Board of Directors Eyüp Engin and Board Member

Dr. Muammer Cüneyt Sezgin serve as members of the Remuneration Committee.

Remuneration Committee convenes at the frequency required by the tasks assigned to it, provided that such frequency shall not be less than 2 meetings per year. The Committee did not hold any meetings within 2020.

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 11 January 2019, independent Board Member Yiğit Bulut serves as the Chairman of the Early Identification and Management of Risks Committee, whereas Vice Chairman of the Board of Directors Eyüp Engin serves as the member of the Committee.

The Early Identification and Management of Risks Committee convenes every two months and carries out its tasks effectively. In 2020, the Committee held a total of two meetings. The Early Identification and Management of Risks Committee was established with the following aims:

- To identify any potential risks that could jeopardize 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 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; and independent Board Member Dr. Nureddin Nebati serves as both the Chairman of the Corporate Governance Committee and the Member of the Nomination Committee.

Türk Telekom Risk Management and Internal Control Mechanism

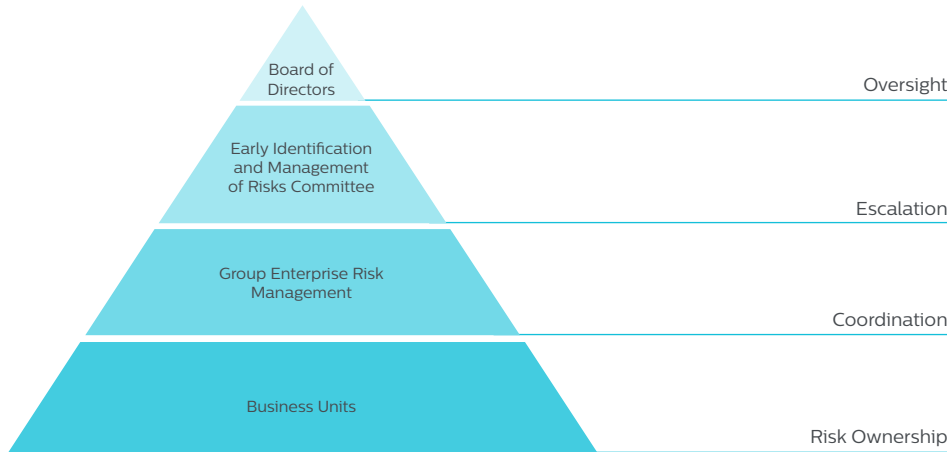
Governance Structure

Risk management 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 implementation processes. Within the scope of the risk management efforts, it is aimed to internalize a risk culture throughout the Group and all activities are carried out with the contribution of all stakeholders with whom risks are associated. Risk management is a natural part of the work undertaken by all employees.

Türk Telekom Corporate Risk Management Governance Model



Türk Telekom Group Enterprise Risk Management Governance Structure

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 Committee on Early Identification and Management of Risks”.

On 5 December 2019, the “Corporate Risk Management Directorate” was restructured as the “Enterprise Risk and Business Continuity Department” directly reporting to the CEO to be in charge of corporate risk management, business continuity and crisis management on behalf of the Türk Telekom Group.

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

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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.

Work 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 taken into account 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. Risk owners conduct cost-benefit analysis and take stakeholder expectations into account, when making decisions to manage risk. Moreover, assessment is carried out into 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.

Sustainability Risk

Corporate sustainability is the Company's ability to manage economic, social, environmental and managerial risks and opportunities; and to be able to create a competitive advantage and a long-term value by focusing on quality, innovation and efficiency both today and the future, in a highly competitive and changing global business environment.

In 2020, a project that is based on the adoption of a sustainability approach was initiated within our Group. With this project, it is aimed to establish the Sustainability Management System and to prepare the Sustainability Report which will ensure the Company to operate with a sustainability perspective while carrying out its activities. Türk Telekom ensures the participation of every relevant unit in this project, with the aim of strengthening our management approach, activities and competitive stance, thus directly affecting our reputation and Company value.

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 25 July 2020, 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

Shareholders were informed of the remuneration basis and criteria which are used to determine all kinds of rights, benefits and salaries provided to the Members of the Board of Directors and the Senior Executives in the

Ordinary General Assembly Meeting dated 25 July 2020. 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.

During the Ordinary General Assembly Meeting held on 25 July 2020, it was decided that the monthly net remunerations¹ per member determined at the Extraordinary General Assembly Meeting held on 25 January 2019, would be increased in line with the 2019 annual consumer price index (CPI) announced by the Turkish Statistical Institute (TürkStat), and that the bonuses, which are to be paid four times in a year as in January, April, July and in October, would also be raised by the same amount as the monthly remunerations.

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.

¹ During the Extraordinary General Assembly meeting held on 25.01.2019, Board of Directors' remunerations which was determined at the Ordinary General Assembly Meeting held on 28 May 2018 as monthly TL 15,000, would be increased in line with the 2019 annual consumer price index (CPI) that announced by the Turkish Statistical Institute (TürkStat).

The remuneration of directors and other members of key management for 2019 and 2020 are as follows collectively:

(TL thousand)	1 January - 31 December 2019	1 January - 31 December 2020
Short-term benefits	161,146	97,873
Remunerations and similar fees	152,913	87,631
Attendance fees	8,233	10,242
Long-term defined benefits	1,921	2,179
Social Security Institution Premiums	1,921	2,179
Total	163,067	100,052

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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.

Anti-Bribery and Anti-Corruption Policy

The policy was approved by the Board of Directors and entered force in November 2020. Internal mechanisms have been established for the implementation of the policy, covering the members of the Company's Board of

Directors and the Company's managers and employees at all levels.

With this policy, it is aimed to clearly reveal the Company's approach and commitments regarding bribery and corruption, to establish rules and responsibilities with regard to the determination and prevention of possible actions that could be evaluated within this scope, to raise awareness among employees and to protect the integrity and reputation of the Company by complying with national and international regulations.

Türk Telekom also expects its suppliers and business partners to comply with this policy and to encourage their employees in this regard. For this purpose, provisions stipulating compliance with this policy is added to contracts which Türk Telekom will enter into with its suppliers and business partners.

Türk Telekom complies with the legal regulations on bribery and corruption in all countries where it operates and is represented.

Türk Telekom adopts a "zero tolerance" approach in tackling bribery and corruption and undertakes to carry out its activities in a fair, honest, legal manner and in compliance with ethics rules. In the Company, which stands against all kinds of bribery and corruption, it is strictly prohibited to receive or offer bribes, regardless of their purpose.

Türk Telekom has identified receiving gifts, organising or attending an event and making or accepting donations, facilitating payments, relations with suppliers and business partners, representation and entertainment, sponsorships, political activities and the accuracy of records as the main areas of risk pertaining to bribery and corruption actions.

Claims and notifications regarding the violations of the Anti-Bribery and Anti-Corruption Policy are considered within the scope of ethical violations, and the Company's corporate website includes an ethical violation notification channel where stakeholders can report any transactions violating the legislation or unethical. Such reports are objectively reviewed by the Türk Telekom Business Ethics Board, which provides consultancy services to employees on ethical issues.

By ensuring that the Business Ethics Board carries out necessary research and investigation, decisions are made within the framework of the findings and any conflicts of interest included on the agenda of the Board are dealt with in a balanced manner. The necessary audits and examinations are carried out by the Company and the results are reported to the applicants. Policy violations result in disciplinary penalties and enforcement of legal

action. If any such violations are detected, the sanctions set out in the disciplinary provisions are applied.

A criminal complaint is lodged to the Public Prosecution Offices about the bribery and corruption that must be transferred to the judicial authorities. In the event of any violation of the policy it is essential to apply the sanctions specified in the contract made with the suppliers and business partners and to terminate the business relationship if necessary. Steps are taken to ensure that employees are not punished or do not suffer any harm for refusing to receive/give bribes. All employees must complete the assigned in-class training or e-training so that this policy can be understood and internalised.

“Anti-Bribery and Anti-Corruption Policy E-Training” was prepared and assigned to all Company employees. It has reached a 55% completion rate in a short period of time and will continue in 2021.

Information Safety Policy

Information security requirements and rights of stakeholders are evaluated within the framework of the Information Safety Policy, under the scope of the Law on the Protection of Personal Data and other legislation. In accordance with the relevant legislation, Türk Telekom undertakes all technical and administrative measures to ensure the appropriate level of security in order to prevent illegal access to personal data or processing of the data, and to ensure the protection of the data.

As a result of efforts to enable the participation of stakeholders in the management, implementation and development of models to enable the participation of Company employees in management such as Occupational Health and Safety Boards, Disciplinary Boards, Conflict Resolution Board, Inventor Idea System continued in 2020.

The participation of employees in the management via Disciplinary Boards and Dispute Resolution Boards is regulated in the Collective Bargaining Agreement.

Human Resources Policy

Türk Telekom aims to be the most preferred employer for professionals in the telecommunications sector and thus, in line with its future strategies and goals, seeks to attract a qualified workforce to the Company in accordance with its corporate culture and values.

Within the framework of technological developments, financial and economic conditions and sectoral changes in its area of activity, Türk Telekom in principle seeks to generate a long-term employment, in order to provide fast, high-quality and affordable services.

Türk Telekom’s track record of success rests on the flexibility of its employees and to proficiency in adapting rapidly and efficiently to the changing conditions of the sector. With their superior skills, competence and experience, the Company’s employees are vital in helping Türk Telekom become one of the world’s leading companies.

Türk Telekom carries out training and development activities in order to ensure the advancement of the knowledge, skills and behaviours of its employees, to reinforce the employer brand, and to embark on development investments with a view to supporting and retaining high performance and high potential, through an integrated talent management perspective.

Ensuring that the right training and development investment is made to the right person at the right time, an active role for managers in the development of their employees, integrating of the development opportunities offered with all human resources processes, promoting the sustainability of training and development activities supported by technology, and the use of alternative development methods and resources in all processes are the basic principles for Türk Telekom.

The Company informs employees of decisions taken or developments concerning employees through the use of appropriate internal communication tools (such as notification, e-mail announcements, instant notifications, the internal communication portal).

Within the framework of the Human Resources Policy established by the Company, the principle of providing equal opportunities under equal conditions is adopted in recruitment and career planning. A uniform set of recruitment rules has been created, with recruitment criteria set on the basis of objective principles.

In cases where changes in the company management are foreseen to cause disruptions in the management of the Company, a succession plan is drawn up to determine the managers to be appointed.

Recruitment processes are determined in accordance with the relevant legislation. The Company’s relations with its employees are managed by Human Resources Business Partners who work under the Human Resources department.

Human Rights Policy

Prepared to determine the principles and rules ensuring that Türk Telekom’s relations with its employees, customers, suppliers, business partners and all stakeholders are managed with due respect for human rights, Türk Telekom Human Rights Policy was approved by

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the Board of Directors and made available to the general public via the Company's Investor Relations website.

The policy has been prepared based on the United Nations Universal Declaration of Human Rights, the Constitution and legislation of the Republic of Turkey, and the International Labour Organisation (ILO) Conventions ratified by Turkey, in compliance with ethical principles, embodying diversity, respect for differences and embracing a participatory approach.

With its Human Rights Policy, Türk Telekom aims to create a working environment which respects human rights and to act in accordance with human rights in its activities. Türk Telekom also expects its suppliers and business partners to comply with this policy and encourage their employees in this regard.

Türk Telekom values diversity and considers diversity as a source of value, and strives to ensure that its employees feel a part of the Company. No person in Türk Telekom can be subject to discrimination for reasons such as age, language, race, ethnicity, nationality, health, disability, gender, marital status, religion and sect, political opinion, philosophical understanding and belief.

Türk Telekom respects and supports the freedom of association and freedom of expression of its employees, as well as to unionisation and collective bargaining. The Company rejects all forms of forced labour, including compulsory work, child labour, employment of illegal immigrants and foreign nationals without a work permit, as well as debt bondage, and all forms of human trafficking. Children under the age of 18 are not hired and international conventions and national legislation approved by Turkey are adhered to on children's rights. This approach is open to vetting by public authorities.

Türk Telekom aims to encourage women's participation in working life and supports the efforts to increase women's employment. Female employees have the opportunity to take paid maternity leave for a total of 16 weeks, eight weeks before and 8 weeks after the birth of their child. In addition, upon request, non-paid maternity leave of up to six months of and 1.5 hours of breastfeeding leave per day until the infant reaches its first birthday. Pregnant or breastfeeding employees are not required to work for more than 7.5 hours per day. In addition to these stipulations, maximum attention is paid to employee rights within the scope of legal requirements.

Claims and notifications regarding any violations of human rights are evaluated within the scope of ethical violations and concluded by examining them confidentially according to the procedures and principles in the Türk Telekom Business Ethics Code. The act of an employee

who reports an issue by honestly stating it, cannot be used to form a negative opinion about this employee himself/herself. In the reporting process, confidentiality rules are essential and the rights of those who report violations are protected. Human rights violations may result in disciplinary action and enforcement of legal sanctions.

In addition, employees are required to submit a statement each year confirming that they comply with the Human Rights Policy and employees receive training every year to adopt and internalise the policy.

No discrimination complaints were filed by the employees in 2020.

"Human Rights Policy E-Training" has been prepared and assigned to all Company employees. It has reached a 55% completion rate in a short space of time and will continue in 2021.

Informing Stakeholders

Türk Telekom 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 and Employer Brand 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.

Social Dialogue and Workplace Harmony

Türk Telekom adopts the principle of ensuring and developing social dialogue with the labour union and workplace harmony within the framework of the unionised organisation and collective bargaining. A Collective Bargaining Agreement is signed with the Turkish Haber-İş Labour Union every two years. The demands and expectations of union members are assessed and managed within the scope of this agreement.

Regular meetings are held between the Turkish Haber-İş Labour Union and Türk Telekom, where the expectations and problems faced by employees are discussed, and workplace harmony has been maintained thanks to effective social dialogue and cooperation. As a result of these meetings, the necessary measures and actions are taken by Türk Telekom, and decisions which

affect employees are reported to the labour union representatives and the labour union.

Türk Telekom regularly notifies and reminds all Central and Regional Units of the overtime rules as per local laws on working hours/overtime and collective bargaining agreements. Every month, an overtime audit is conducted at Türk Telekom to monitor compliance with the Türk Telekom Principles, the collective bargaining agreement and the relevant laws. At Türk Telekom, the minimum wage is determined by collective bargaining agreement and higher than the legal minimum limit.

Recruitment Processes

Türk Telekom's recruitment efforts are aimed at meeting the Company's needs for qualified workforce by employing the most appropriate candidates with the required level of competence and experience. The recruitment process is evaluated in three phases: Demand Management, Selection and Placement.

In the Demand Management process, annual workforce plans are prepared by taking into consideration the needs of the organisation, norm staff and new staff. For the selection process, a rich candidate pool is created out of which suitable applicants are chosen with objective criteria. The Company's career site, leading recruitment sites along with domestic and foreign HR consultancy firms are used to this end. In order to reach potential candidates, contact is made with official institutions such as universities, professional chambers and İŞKUR (Turkish Employment Agency), while digital and social media tools also employed.

In order to ensure objectivity and accurately assess competence in the selection process, various measurement and evaluation tools are used. All candidates that have not been selected are notified.

Work Culture

Türk Telekom aims to establish an enduring relationship with its employees, managers and stakeholders based on respect, trust and ethical values, with the values it adopts and the Company culture it creates and sustains on the basis of respect and sharing.

There is a performance oriented, innovative and agile working culture at Türk Telekom, based on winning together with cooperation and team spirit. As a requirement of global competition and relentless pace of change in the sector, new working models such as the agile task force are implemented.

Occupational Health and Safety and the Environment

Creating a healthier and safer working environment for its employees, minimising the effects of damage to the environment through its activities, and implementing environmentally friendly technologies are adopted by the Company as its prioritised objectives.

In line with this target, employees are expected to;

- act in accordance with legal regulations, practices and accepted standards in the workplace,
- comply with the measures taken as a result of all risk and impact assessments with a preventive approach,
- implement systems to minimise the occurrence of incidents, accident or emergency losses,
- participate in training programs organised to promote safety culture, risk perception and environmental awareness,
- demonstrate an objective and transparent attitude in audits related to occupational health, safety and the environment,
- notify and report any behaviour, situation or accident which could endanger occupational health and safety,
- act in harmony with the responsible Occupational Health and Safety specialist in charge.

Türk Telekom, which has adopted proactive and productive Occupational Health and Safety and Environmental Management standards, works to improve these management systems to prevent occupational accidents, to raise environmental awareness and to promote occupational health and safety and an environmental culture among employees.

Türk Telekom systematically defines the methods and principles for identifying the potential hazards arising from its activities, the products and services and the risks associated with them, and evaluates the environmental impacts and aspects, thus controlling the potential dangers. In line with these definitions, the Company prepares and reports risk and environmental impact assessment tables with the aim of minimising occupational accidents and occupational illness, along with the environmental aspects.

The aim of the work is to identify risks which may cause occupational accidents and occupational illnesses before they occur, and to take appropriate measures.

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In order to protect employees from work-specific hazards, personal protective equipment is provided where collective protection is not possible.

“Occupational Health and Safety Committees” have been established in the workplaces of the Company. At periodic meetings, the following tasks are fulfilled:

- Guiding employees regarding occupational health and safety issues,
- Evaluating hazards and precautions related to occupational health and safety at the workplace, determining the measures and notifying the employer or their representatives,
- Carrying out the necessary investigations, identifying measures to be taken and notifying the employer or the employer’s representative with a report in the event of any occupational accident in the workplace or an occurrence at the workplace which does not qualify as an occupational accident but may cause damage to the workplace or to work equipment, or in case of occupational illness or occupational health and safety hazards,
- Planning trainings on occupational health and safety in the workplace, preparing programs related to occupational health and safety and related rules, presenting them to the employer or the employer’s representative for approval, monitoring the implementation of these programs and providing feedback in the event any deficiency is noted,
- Planning the security measures necessary during maintenance and repair work to be performed at the workplace and monitoring the implementation of these measures,
- Monitoring the adequacy of the measures taken against fire, natural disasters, sabotage or similar hazards in the workplace and monitoring the work carried out by the relevant team.

Employee representatives also participate in these committees as members, and all kinds of feedbacks provided by employees on occupational health and safety measures are evaluated.

Performance Management and Continuous Improvement

The Performance Management Process ensures that the targets determined in line with the Company’s vision and the strategic priorities of the relevant year are attained with the contribution of the employees; that employees’ contribution to the attainment of targets are assessed

in an objective, systematic and measurable manner, and that a motivating work environment and personal development are fulfilled.

Each year, the Company’s objectives are planned on a departmental and individual basis, so that employees can perceive how their individual efforts contribute to the bigger picture with individual targets. The target dissemination meetings, which are held annually following the preparation of the Senior Management Target Cards, are aimed at disseminating the performance culture across the Company, determining the targets in accordance with the SMART (Clear-Measurable-Achievable-Compatible-Time-Based) criteria and ensuring that the management level is on the same page for an appropriate evaluation to be undertaken. It is important that the managers communicate the information and guidance shared during these meetings to their teams.

The outcomes of the Performance Management Process serve as inputs for Wage Management and Rewarding, Career and Talent Management, Training and Development and Performance Development Process activities.

Communication works regarding the Performance Management Process and System such as guidelines, announcements, visuals, infographics, videos etc. are shared with the relevant target audience during performance periods.

Remuneration

In order to achieve its goals, Türk Telekom aims to attract qualified employees to the Company, to retain employees, to uphold motivation to ensure a sustainable service, and to reward those who demonstrate an outstanding performance. In this context, remuneration is determined by evaluating the relevant legislation, job description, responsibilities, required qualifications and market value.

Non-Compensation Benefits

Türk Telekom provides its employees with various benefits such as free communication services, free life and accident insurance, meal card, personnel transportation, Company vehicle and private pension support in order to improve working conditions and living standards. Türk Telekom also contributes to the living standards of its employees and their families through various funds, health and social care organisations. In addition, Türk Telekom implements a private pension system to further support its employees’ life during their retirement. These benefits vary depending on various parameters such as employees’ employment contracts, status, fields of work, title, position and job levels.

Code of Business Ethics

Drawn up in line with Türk Telekom's vision, mission and values in order to describe how all employees should act both within and outside working environment and what type of sanctions would be applicable in instances where the Code was contravened, The Business Ethics Code covers all employees including members of the Board of Directors. The Code of Business Ethics has been approved by the Board of Directors and disclosed to the public both in Turkish and English through the Company's investor relations website.

Newly recruited employees of the Company are sent the "The Business Ethics Code" and the "Business Ethics Notification Form" by the Recruitment team via e-mail, and are required to sign the Notification Form. In addition, at the beginning of each year, the "Business Ethics Code Compliance Form" declarations of all employees are renewed.

In addition, e-training programs are prepared to inform existing employees on the Business Ethics Code; ensure that the policies and rules are understandable, and to ensure the observance of ethical standards. On the other hand, these topics feature in some in-class trainings such as Job Orientation Training, Occupational Health and Safety Training and Manager's HR Framework Training. In these training programs, information about the Business Ethics Code and definitions of mobbing, its scope, the roles and responsibilities of employees and managers in these issues, sample cases, and how and to whom ethics violations should be reported, are shared with the participants.

All Türk Telekom employees are responsible for maintaining, establishing and sustaining ethical standards, and each employee is a voluntary auditor. Managers also set an example by acting in compliance with the code of ethics, encouraging a culture of behaving in accordance with these rules and responding to the questions or concerns of their employees regarding the Business Ethics Code.

In the event that a violation of the Business Ethics Code is detected or observed, this situation is honestly reported through one of the ethical violation reporting channels. Notifications regarding violations of the Business Ethics Code cannot be prevented in any way, and employees may bypass their managers to lodge notifications.

Imposition of sanctions such as discrimination, demotion, dismissal, deprivation of rights, threats or harassment of employees that disclose violations or are involved in investigation processes also constitute breach of the Business Ethics Code. Any infringements by employees are taken into consideration in HR practices.

Türk Telekom attaches importance to acting lawfully, ethically and honestly towards its employees, customers, suppliers, business partners and official authorities, and to inspire a sense of trust in everyone with whom it has a business relationship. As per the Business Ethics Code concerning the prevention of bribery and corruption, employees are prohibited from obtaining personal benefits by virtue of their position and from providing benefits to their relatives or third parties. Employees are required not to use their positions, Company property or Company information for their personal interests, not to put their personal interests above the Company's interests, and to safeguard the Company's benefit. In addition, employees are barred from submitting to any pressure which may have unfavourable consequences for the Company, driving any personal benefit from customers/suppliers/business partners, and transferring benefits by serving as an intermediary among them.

Employees are expected to act cautiously when receiving gifts, invitations and donations or accepting them on behalf of the Company; and are expected to exercise sound judgment and avoid conflicts of interest.

In this context, regardless of its material value it is stated that;

- no gifts that imply a relationship that could affect impartiality and independence can be given or accepted,
- no gifts that would place the employee or the Company under any obligation and may damage their reputation can be given or accepted,
- no gifts that are given to derive benefits from the employee, to affect the way the employee performs their duty, to encourage any actions that would contravene the behaviour patterns set out in the Business Ethics Code, which are in the form of cash or convertible to cash whose value exceed the permitted limit, can be accepted.

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Procurement and Supplier Management

The procurement activities conducted by Türk Telekom and the Group Companies and the forming and controlling of standards are undertaken centrally by the Department of Support Services and Procurement Management. The Support Services and Procurement Management Assistant General Manager is responsible for the execution of the Procurement Policy and updating it when necessary.

The Mission of Türk Telekom Procurement and Supplier Management is:

- to determine and implement procurement strategies which will contribute to Türk Telekom's goals,
- to separate all procurement decisions and processes and maintain them in accordance with the Company's policies,
- to support business units in achieving their business targets,
- to carry out the procurement process with the most appropriate quality, price and technical performance, and
- to manage supplier relations in a sustainable and effective manner by developing the Türk Telekom Group ecosystems.

The Vision of Türk Telekom Procurement and Supplier Management is:

To be one of the most competent procurement and supplier management teams, to use the best practices at global and sectoral level, and to contribute to the Türk Telekom Group strategies.

The duties and authorities of the rules and processes for the purpose of achieving the principle of "creating the necessary competitive environment and meeting demand at the most affordable price, duration, quality and conditions", which constitutes the basic procurement strategy of the Company, are determined by the Procurement Policy and Procedure approved by Türk Telekom Board of Directors.

The Procurement Policy and Procedure covers all Türk Telekom Group employees who play a role in demand/ procurement processes. The Procurement Policy and Procedure is published on the Company's internal communication channels. All employees are informed of any changes by e-mail. When necessary, training activities are carried out on the relevant subject for the employees of the Company.

The Procurement Policy published on the Türk Telekom website is accessible to suppliers from all over the world in Turkish and English. Suppliers are informed of the Türk Telekom Procurement Policy in their work processes. A copy of the Policy is provided to suppliers requesting it.

At Türk Telekom;

In order to conduct procurement in the most appropriate manner and to generate added value, a holistic procurement strategy based on end-to-end management of processes has been adopted.

As a result of the global pandemic, the practice of working from home was implemented within the Company in 2020. Thanks to the Company's high-tech system support, working conditions were organised in the most effective way, ensuring no loss of performance. Thanks to the effectiveness of procurement processes and the importance placed on supplier diversity, supply chain disruptions faced by many sectors and companies in the world and in our country during the pandemic were eliminated. Thanks to the ability to carry out tenders through the online procurement system, the tender processes were successfully completed.

In order to make the supplier management effective and to standardize the application, the processes are defined in a clear and straightforward fashion.

Supplier Performance Evaluation processes are managed through the system. In 2020, improvements were made on the Supplier Performance Management System, which has then gone live. With these improvements, it is aimed to be able to effectively monitor and report the supplier performance and action through the system. Supplier performance can now be evaluated without manual intervention needed in the process, and the evaluation results work with operational procurement documents in an integrated manner.

Supplier performance evaluations are carried out continuously in 6-month periods and the segmented suppliers are subjected to detailed evaluation in accordance with the main headings determined. Suppliers are also evaluated in the fields of occupational health and safety, the environment, quality and organisation, and feedback is provided to them about the results.

In the first half of 2020, suppliers covering approximately 60% of the Company's total procurement volume were evaluated according to the project-based SLA criteria, the commercial and seasonal framework, and feedback was provided to them based on the results.

Türk Telekom's procurement process approach

An effective and lean procurement structure is designed through restructuring the responsibilities of the demand and procurement units with an understanding of increasing efficiency by taking the fundamental elements such as total cost of ownership, supply chain risks and sustainability into account.

An approval mechanism, which includes managerial control in authority limits, was established by taking the organisation of the Company into account.

Procurement activities of Türk Telekom Group Companies are carried out in accordance with the relevant legislation, the provisions of Türk Telekom Group Procurement Policy and Procedures, and with the tender/bid request procedure.

Procurement teams are informed of the procurement and supply chain steps and standards through internal meetings and trainings.

By taking the principle of separation of duties into account, the procurement units and other units perform their duties within their areas of responsibility in terms of procurement in line with this specified policy.

In order to carry out procurement activities in the most accurate quality, duration and cost, all relevant units work with an awareness of informing each other in a timely manner and performing their duties fully.

For the aim of conducting procurement in line with the interests of the Türk Telekom Group, all steps are taken to ensure that a transparent and competitive environment is established in all dimensions by acting within the short, medium and long term business plans.

In order to benefit from the volume advantage in purchases and the total procurement power of Türk Telekom Group, the needs that show integrity in terms of economic and technical basis are combined as much as possible and then the demand is created.

An effective procurement is realised by taking into account the basic elements such as TCO (Total Cost of Ownership), supply chain risks and sustainability.

In order to avoid undermining supplier trust, placing additional workloads upon suppliers, except for commercial obligations, is prevented.

The needs of the Türk Telekom Group Companies are met first-hand as much as possible (by the manufacturer, importer or general distributor) by taking into account the nature of work.

The principles of supplier management

The basic principles adopted by Türk Telekom in the supplier management process are:

- Transparency,
- Fair and equal distance,
- Communication within the framework of respect and honesty,
- Maintaining intellectual property and confidential information.

Sustainable procurement approach

The aim of the sustainable procurement approach is to ensure sustainability in Türk Telekom Group's activities in general through purchasing activities.

Türk Telekom's core values in procurement processes are transparency, integrity and honesty. The details of the relationships of Türk Telekom Group employees with stakeholders and suppliers, particularly those stated below, are based on the core values set out in the Türk Telekom Code of Work Ethics.

At Türk Telekom;

- Maximum care is put forward to ensure the obligations to suppliers are fulfilled in a timely manner within the framework of contracts.
- All measures are taken and meticulously monitored to ensure that the procurement processes are conducted in line with the laws and the Company policies.
- In accordance with the purchasing unit's responsibilities with regard to supplier relations, suppliers are provided with supportive information about the Company's Procurement Policies and Procedures throughout the year.
- Necessary guidance is provided to ensure that suppliers act in line with Türk Telekom's policies on human rights, human resources, human health and environmental matters.
- Competition among competitors is ensured in the framework of legal and ethical rules within the scope of purchasing activities.

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- Steps are taken to ensure that suppliers do not adopt attitudes or behaviour which will harm the brand value of the Türk Telekom Group.
- Suppliers are not burdened with any obligations beyond those stipulated by legislation and commercial conventions.
- Suppliers are approached fairly and equally in line with competition and market conditions.
- Evaluations are conducted according to fair and objective criteria in supplier selection.
- Relations with suppliers are conducted on a transparent and fair ground by avoiding conflicts of interest and without personal interest.
- The procurement process is managed in a way to prioritize the protection of the environment and human health, to reduce the consumption of natural resources and to minimise waste.

Türk Telekom Group exercises maximum care to comply with the principles of sustainability and selects products which most closely meet the conditions, or alternative local products where possible.

Obligations of suppliers within the scope of the policies and contracts

In addition to the general obligations, suppliers have the following obligations as set out in the provisions of all contracts, to which Türk Telekom is a party, in the procurement processes;

- To fulfil their obligations with regard to their personnel in accordance with applicable laws, especially the Labour Law, Social Security Law, Law of Obligations and other relevant legislation, and by ensuring that their personnel and subcontractors act in accordance with such legislation as well,

- To fulfil the legal, criminal and financial obligations arising from the relations with the Regional Labour Directorate, the Social Security Institution, the Ministry of Health and other authorised institutions, as well as applicable legislation,
- To comply with the relevant laws, regulations, statutes and other legislation in force regarding the performance of obligations under the contract and regarding the work and occupational health and environmental safety issues.

In addition, discrimination is not practiced in Türk Telekom supply chain in accordance with the Türk Telekom Human Rights Policy, and no employment of child labour or forced labour is tolerated.

Care is taken to work with suppliers who support safe working conditions, and suppliers are expected to fully support their employees' freedom of organisation and the right to collective bargaining.

Non-compliance with the policies and procedures

Maximum care is put forward to ensure that suppliers comply with legislation and the code of ethics. Suppliers are monitored by the demand and procurement units at Türk Telekom throughout the business relationship. In the event of any violations or in cases where there is deviation from the Company's policies, necessary notifications and warnings are issued, corrections are requested and/ or business relations with suppliers are reviewed.

Türk Telekom Group has the right to terminate its relations with the suppliers that do not comply with the rules and business relations are terminated with the suppliers persisting to continue the negative situation.

Information Security

Information Safety is one of the seven codes of the Türk Telekom Code of Business Ethics document. As explained in the “Information Safety Policy” set in the Code of Business Ethics, “information is defined as all data, text, image, audio and similar contents in the physical or digital environment that is produced, used, transmitted, archived or legally transferred to the Company during business processes.”

Information including, but not limited to, the Company’s strategic information, organisational information, commercial/technical/financial data, customer/dealer information, information on policies/procedures/regulations, product and service information and personal information of employees are considered within this scope. Information Safety Management System covers Türk Telekom and Group Company’s all in-house and outsourced employees, infrastructure, systems and applications, as well as products and services.

With regard to information security, the employees are informed about the Working Principles of Türk Telekom Human Resources upon their signed approval that;

- they should attach importance to the confidentiality of information that has confidential and/or trade secret nature, and fulfil the duty of loyalty and non-disclosure;
- they should protect the confidential and private information of employees, customers, suppliers, business partners and other people and institutions with whom the Company works, and not use this information for any purpose other than the intended business purpose;
- they should not share with unauthorised people and authorities inside or outside the Company the information and documents they acquired for business purposes, and not use these for personal aims; and
- they should not use the information and documents they own in a manner detrimental to the Company or in favour of competitors after they leave the Company.

Besides, the employees are also notified by the Working Principles of Türk Telekom Human Resources, Commitment for the Use of Information Technologies and the Code of Business Ethics which is required to be signed every year that;

- they should attach importance to the protection of intellectual property such as patents, commercial secrets, copyrights, names and trademarks;

- leakage of any confidential information and/or documents within the scope of “Insider Trading” and benefit via stock exchange or any other means are prohibited;
- when some information needs to be shared with third parties due to business-related requirements, such information should be shared without causing any damage to the Company (through confidentiality agreements etc.) by informing the information security unit/ relevant unit and obtaining approval from the senior manager and
- the e-mail account provided by the Company is allocated for Company affairs, and may be audited.

In addition,

- the Working Principles of Türk Telekom Human Resources and Commitment for the Use of Information Technologies state that the information and documents requested by regulatory authorities and independent auditors should be shared when necessary, correctly and on time in accordance with the Company practices, and all requests of the relevant institution should be fulfilled during onsite examinations; and
- in case of access, exposure to, or sharing of, any confidential information without authorisation/ accidentally, an application should be filed with the information security unit and any of the notification channels listed under “Notification of Ethic Violations” heading of the Code of Ethics.

In case of breach of any of the foregoing conditions, ethical and disciplinary processes are carried out, and the employees may be punished with any of the penalties set forth in the Disciplinary Principals depending on the breach.

The measures to be taken in relation to Information Security have been detailed in the “Information Safety Policy” document prepared by the Company’s technology units, and have been shared with the employees through Türk Telekom Port, the internal communication portal.

Information Security Management System and Audit

The personal data required for the provision of the services to the customers may be accessed only on a strict need to know basis. In order to identify suspicious usage or usage for purposes other than the stipulated purpose, access to these data is continuously recorded and audited.

At the Company, inter-system access, remote access to systems, access to databases, user identification processes and reporting request processes are carried

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out via secure and controlled processes designed through request management systems. Security tests are performed on the systems before the projects go live and at certain intervals, and any security findings identified are resolved by the relevant teams.

Security risks are minimised by separating the application layer, the database layer and the web layer through the layered structure set in the network layer. Network level security devices ensure controlled access in accordance with established rules. Pursuant to the "Separation of tasks and environments" clause of the Regulation on Network and Information Security, the processes for initiating and approving transactions to be performed on critical systems have been separated. Within the scope of access control, all systems are reviewed at least once a year in accordance with the Türk Telekom Group Information Safety Policies and Procedures.

The movements of end-users are monitored, and the systems aiming to prevent intentional or accidental data leakage from all kinds of channels through which critical data is processed and transferred are used in networks. Anonymization and masking of critical/personal/confidential data, and authorisation of relevant users are performed on the databases in order to fulfil the requirements of the Law on Protection of Personal Data (KVKK) and to prevent unauthorised access to confidential data.

The one-year audit plan, which principally covers technology processes and is prepared based on the risk assessments performed at the end of each year, is approved by the Audit Committee which operates under the Board of Directors. Türk Telekom Internal Audit Department is authorised to perform the approved audit plan.

In recent years, information security has been seen as one of the most critical areas among the subjects handled during the risk assessments carried out within this framework. Thus, the audit plans of Türk Telekom Internal Audit Department cover the Information Safety

Policies and Systems every year. On the other hand, the Internal Audit Department provides reasonable assurance for the audits in the fields related to Information Security within the Türk Telekom Group within the framework of the methodologies used, in accordance with generally accepted auditing principles.

All employees are assigned with e-trainings every year with the aim of raising awareness within the scope of the Information Security Management System.

In addition, in-class information security awareness trainings are provided once a year for employees such as subcontractor personnel.

Information Security Certifications

Türk Telekom holds the ISO 27001 certificate covering fixed and mobile networks. Within this scope, Information Security Internal Audit activities are carried out on an annual basis, and action assignments and follow-ups are performed in accordance with the results of the audit. Moreover, all employees are assigned Information Security Awareness Training periodically within the scope of the ISO 27001 standard.

In addition to that, the Company holds PCI-DSS certification under the scope of mobile network. Credit card data are periodically scanned on the systems, and security measures are taken as required by the standards. Within the scope of the PCI-DSS, related employees are provided awareness training periodically as required by the standard.

Information on the Protection of Personal Data

Türk Telekom's ("Türk Telekom, TTNET and TT Mobil") Clarification Text for its subscribers/customers within the scope of the Law No. 6698 on the Protection of Personal Data ("KVKK") was updated in July 2019. This text contains all details regarding;

- a) The identity of data controller,
- b) The purpose of processing personal data,
- c) To whom and for which purpose personal data may be transferred,
- d) The method and legal grounds of collection of personal data and other rights of the data subject under Article 11 of the Law.

In addition, clarification texts are designed and published for employees, visitors, etc. related person categories and different Türk Telekom sites.

Rights of the data subject in the KVKK

ARTICLE 11 – (1) Each person has the right to request to the data controller about himself/herself;

- a) to learn whether his/her personal data are processed or not,
- b) to request for information as to if his/her personal data have been processed,
- c) to learn the purpose of the processing of his/her personal data and whether these personal data are used in compliance with the purpose,
- d) to know the third parties to whom his personal data are transferred in country or abroad,
- e) to demand the rectification of the incomplete or inaccurate data, if any,
- f) to request the erasure or destruction of his/her personal data under the conditions referred to in Article 7 (personal data shall be erased, destructed or anonymised by the data controller, ex officio or on the request of the data subject, in the event that the reasons for the processing no longer exist.),
- g) to request reporting of the operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom his/her personal data have been transferred,

h) to object to the occurrence of a result against the person himself/herself by analysing the data processed solely through automated systems,

i) to claim compensation for the damage arising from the unlawful processing of his/her personal data.

Data processing parties on behalf of Türk Telekom

Türk Telekom has authorised dealers, which process the data of customers as a third party on behalf of itself. All dealer employees are informed on the legislation governing the protection of personal data through circulars and information guide. In addition, all dealers have updated subscriber/customer information notices located on visible areas. Detailed information texts are provided to subscribers and dealer employees about the business flows requiring express consent, customer explicit consent templates have been drawn, and all dealers are required to obtain these consents when needed.

All agreements to which Türk Telekom is a party are reviewed and revised in line with the KVKK and the secondary legislation. In addition, trainings, announcements and audits were carried particularly for business partners and dealers as a part of the administrative measure obligation to ensure the security of personal data, and will continue to be carried in line with the possible amendments in the legislation.

Liability of the Company management regarding the protection of personal data

In accordance with the KVKK, the legal entities are responsible for all liabilities arising from this law and the relevant legislation. In terms of Türk Telekom, the Türk Telekom Board of Directors /Executive Committee is responsible for the Confidentiality and Safety of Personal Data as the managing body of the data controllers.

Within this framework, the Board of Directors has decided for the establishment of upper and sub-committees consisting of Assistant General Managers and directors for the monitoring and management of Türk Telekom's compliance process.

With the aforementioned decision, the Committees were assigned on behalf of the Company within the scope of fulfilling their obligations arising from the KVKK and in accordance with Article 11 of the Regulation on the Registry of Data Controllers ("Regulation").

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Türk Telekom General Manager/CEO has been authorised to determine and change the working principles and duties of the committees and persons to take part in the committees.

The purpose of the mentioned committees is the coordination and organisation of the activities carried out in the field of governance regarding the protection of personal data throughout the Company, monitoring and reporting the actions to ensure full compliance with their requirements, supporting the governance structure, taking and following up strategic decisions, determining resource needs, creating an agenda at the level of the Board of Directors/Executive Committee.

Upper and Sub Committee Members

I. Upper Committee Members

1. Permanent Members

- Legal and Regulation Assistant General Manager
- Technology Assistant General Manager
- Marketing and Customer Care Assistant General Manager (Marketing and Customer Care Director as representative)
- Strategy, Planning and Digital Assistant General Manager

2. Advisory Members

- Regulation Compliance Director (permanent)
- Cyber Security Director (in necessary cases)

II. Sub Committee Members

- Regulation Compliance Director
- Cyber Security Director
- Legal Affairs (Corporate Law and Commercial) Director
- Employee Experience and Wage Management Director
- Facility Management Director
- Technology Audit Vice President

- Marketing Intelligence and Customer Experience Director
- Product and Service Management Director
- Purchasing Director
- Retail Sales Operations and Control Group Manager
- Digital Product and Service Development Director
- IT Architecture and Quality Assurance Director
- Technology Governance Group Manager
- Wholesale Customer Service Director

Employee trainings related to personal data security and confidentiality

Personal data security and confidentiality trainings have been assigned online to all permanent employees of Türk Telekom, TT Mobil and TTNET, while regional class trainings were provided to the sales teams, regional employees and dealers' employees.

The regular trainings provided address the following topics:

- History and the legal basis of the EU Data Protection Regulation and Turkish legislation governing personal data protection
- The Company's main responsibilities on the issue
- Personal Data Processing Inventory and VERBIS (Data Controller Registry Information System)
- Rights of the data subject
- Data storage periods and deletion/destruction
- Penalties set forth in the applicable law and regulations
- Special measures that need to be taken in the Company business processes
- Actions to be taken specifically for sensitive personal data
- Information security awareness

Türk Telekom has also started compliance studies within the scope of the "Regulation on the Processing of Personal Data and Protection of Privacy in the Electronic Communication Sector", which was published by BTK on December 4, 2020 and will enter into force on June 4, 2021.

Corporate Governance Compliance Report

	Compliance Status					Not Applicable	Explanation
	Yes	Partial	No	Exempted			
1.1. FACILITATING THE EXERCISE OF SHAREHOLDER RIGHTS							
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						
1.2. RIGHT TO OBTAIN AND REVIEW INFORMATION							
1.2.1 - Management did not enter into any transaction that would complicate the conduct of special audit.	X						
1.3. GENERAL ASSEMBLY							
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 occurs did not come.	
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 2020	
1.4. VOTING RIGHTS							
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 company withholds from exercising its voting rights at the General Shareholders' Meeting of any company with which it has cross-ownership, in case such cross-ownership provides management control.					X	Such a situation occurs did not come.	

CORPORATE GOVERNANCE PRINCIPLES COMPLIANCE REPORT

	Compliance Status					Explanation
	Yes	Partial	No	Exempted	Not Applicable	
1.5. MINORITY RIGHTS						
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 TTK and CMB regulations.
1.6. DIVIDEND RIGHT						
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					
1.7. TRANSFER OF SHARES						
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.
2.1. CORPORATE WEBSITE						
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					

	Compliance Status					Not Applicable	Explanation
	Yes	Partial	No	Exempted			
2.2. ANNUAL REPORT							
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						
3.1. CORPORATION'S POLICY ON STAKEHOLDERS							
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						
3.2. SUPPORTING THE PARTICIPATION OF THE STAKEHOLDERS IN THE CORPORATION'S MANAGEMENT							
3.2.1 - The Articles of Association, or the internal regulations (terms of reference/manuals), regulate the participation of employees in management.			X			There are internal directives about this topic. Models for participation of company employees in management such as Occupational Health and Safety Boards, Disciplinary Boards, Dispute Resolution Boards, Inventor Idea System continued to be developed in 2020.	
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						
3.3. HUMAN RESOURCES POLICY							
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						

CORPORATE GOVERNANCE PRINCIPLES COMPLIANCE REPORT

	Compliance Status					Explanation
	Yes	Partial	No	Exempted	Not Applicable	
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					
3.4. RELATIONS WITH CUSTOMERS AND SUPPLIERS						
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					
3.5. ETHICAL RULES AND SOCIAL RESPONSIBILITY						
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					
4.1. ROLE OF THE BOARD OF DIRECTORS						
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					
4.2. ACTIVITIES OF THE BOARD OF DIRECTORS						
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					

	Compliance Status					Not Applicable	Explanation
	Yes	Partial	No	Exempted			
4.2.8 - The company has subscribed to a Directors and Officers liability insurance covering more than 25% of the capital.	X						
4.3. STRUCTURE OF THE BOARD OF DIRECTORS							
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 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						
4.4. BOARD MEETING PROCEDURES							
4.4.1 - Each board member attended the majority of the board meetings in person.	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.

CORPORATE GOVERNANCE PRINCIPLES COMPLIANCE REPORT

	Compliance Status					Explanation
	Yes	Partial	No	Exempted	Not Applicable	
4.5. BOARD COMMITTEES						
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 2020, 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					
4.6. FINANCIAL RIGHTS						
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

Corporate Governance Information Form	
1. SHAREHOLDERS	
1.1. Facilitating the Exercise of Shareholders Rights	
The number of investor meetings (conference, seminar/etc.) organised by the company during the year	In 2020, investor conferences in the US and UK held online due to Covid-19. Maintaining its close relations with investors even in this difficult period, Türk Telekom had an active year. During 2020, Türk Telekom attended conferences, 2 of which were physical and 13 were online. In addition, Türk Telekom organised 5 virtual non-deal roadshows and 2 deal-roadshows regarding TL bond issuance. Including the one-on-one investor meetings, Türk Telekom Investors Relations met over 370 equity and fixed investors throughout the year.
1.2. Right to Obtain and Examine Information	
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
1.3. General Assembly	
Link to the PDP announcement that demonstrates the information requested by Principle 1.3.1. (a-d)	https://www.kap.org.tr/tr/Bildirim/824027 https://www.kap.org.tr/tr/Bildirim/824031 https://www.kap.org.tr/tr/Bildirim/824668 https://www.kap.org.tr/tr/Bildirim/833283 https://www.kap.org.tr/tr/Bildirim/854285 https://www.kap.org.tr/tr/Bildirim/861910 https://www.kap.org.tr/tr/Bildirim/866160
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)	https://www.kap.org.tr/tr/Bildirim/874802
The name of the section on the corporate website that demonstrates the donation policy of the company	http://www.tyaticiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies.aspx http://www.tyaticiliskileri.com.tr/Documents/en/corporate-governance/donation-policy.pdf
The relevant link to the PDP with minute of the General Shareholders' Meeting where the donation policy has been approved	https://www.kap.org.tr/tr/Bildirim/362681
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 2020 except by shareholders.

CORPORATE GOVERNANCE INFORMATION FORM

1.4. Voting Rights									
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					55%				
1.5. Minority Rights									
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.				
1.6. Dividend Right									
The name of the section on the corporate website that describes the dividend distribution policy					http://www.ttyatirimciiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies.aspx http://www.ttyatirimciiliskileri.com.tr/Documents/en/corporate-governance/dividend-policy.pdf				
Minutes of the relevant agenda item in case the board of directors proposed to the general assembly not to distribute dividends, the reason for such proposal and information as to use of the dividend.					-				
PDP link to the related general shareholder meeting minutes in case the board of directors proposed to the general assembly not to distribute dividends					-				
General Assembly Meetings									
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
25.07.2020		92.91%	0%	92.91%	Corporate Governance/ General Assembly Meeting Information	Corporate Governance/ General Assembly Meeting Information			https://www.kap.org.tr/tr/Bildirim/861910

2. DISCLOSURE AND TRANSPARENCY

2.1. Corporate Website

Specify the name of the sections of the website providing the information requested by the Principle 2.1.1.	http://www.ttyatirimciliskileri.com.tr/en-us/pages/default.aspx 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
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.	http://www.ttyatirimciliskileri.com.tr/en-us/turk-telekom-group/investing-in-turk-telekom/pages/ownership-structure.aspx http://www.ttyatirimciliskileri.com.tr/Documents/en/detailed-shareholder-structure.pdf
List of languages for which the website is available	Turkish, English

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.

a) The page numbers and/or name of the sections in the Annual Report that 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	Corporate Governance Principles Compliance Report section
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
ç) 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 2020.
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%	Corporate Governance Principles Compliance Report 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	Sustainability and Corporate Social Responsibility and Corporate Governance Principles Compliance Report Section

CORPORATE GOVERNANCE INFORMATION FORM

3. STAKEHOLDERS

3.1. Corporation's Policy on Stakeholders

The name of the section on the corporate website that demonstrates the employee remedy or severance policy	http://www.tyaticiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies.aspx http://www.tyaticiliskileri.com.tr/Documents/en/corporate-governance/compensation-policy.pdf
The number of definitive convictions the company was subject to in relation to breach of employee rights	-
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	etik@turktelekom.com.tr http://www.tyaticiliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-committee-communication-form.aspx

3.2. Supporting the Participation of the Stakeholders in the Corporation's Management

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	Türkiye Haber-İş Union

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	<p>Human Resources Policy</p> <p>In cases for executive position changes that might lead to disruptions in company management, back up plans are prepared for the determination of the new managers to be appointed.</p>
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.	<p>http://www.tyaticiliskileri.com.tr/en-us/socially-responsible-investing/pages/policies.aspx http://www.tyaticiliskileri.com.tr/Documents/en/corporate-governance/human-resources-policy.pdf</p> <p>Human Rights Policy</p> <p>Türk Telekom aims to recruit its employees on long term basis as a principal to provide rapid, 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 ability of its employees to adapt rapidly and efficiently to the changing conditions of the sector, as well as their flexibility in 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 programs carried in cooperation with regulatory and supervisory agencies as well as the universities and provides employment opportunities within this framework. Our company asserts its claim of being the most preferred company to work for by sharing the 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. http://www.tyaticiliskileri.com.tr/Documents/en/corporate-governance/human-rights-policy-20191129.pdf</p> <p>Diversity</p> <p>Türk Telekom values diversity and considers this as an asset, and strives to make its employees feel like they are a part of the Company. Accordingly, Türk Telekom is committed to equal opportunity, and takes into account the qualifications, performance, skills and experiences of its employees for recruitment, placement, development, training, compensation, promotion, and resignation from the Company. Is aware that diversity in its labour contributes to achievement of the Company targets, and strives to recruit candidates with diverse backgrounds and experience, and employ them for a long term. Fulfils its legal obligations in relation to employment of people with disabilities, and disadvantages</p>
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.	http://www.ttyatirimciliskileri.com.tr/Documents/en/corporate-governance/human-rights-policy-20200529.pdf Discrimination and Harassment At Türk Telekom; 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	1
3.5. Ethical Rules and Social Responsibility	
The name of the section on the corporate website that demonstrates the code of ethics	http://www.ttyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies.aspx http://www.ttyatirimciliskileri.com.tr/Documents/en/corporate-governance/Code-of-Ethics.pdf
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.	http://www.ttyatirimciliskileri.com.tr/en-us/socially-responsible-investing/pages/sustainability.aspx http://www.ttyatirimciliskileri.com.tr/en-us/socially-responsible-investing/pages/corporate-social-responsibility.aspx
Any measures combating any kind of corruption including embezzlement and bribery	http://www.ttyatirimciliskileri.com.tr/en-us/socially-responsible-investing/pages/policies.aspx http://www.ttyatirimciliskileri.com.tr/Documents/en/turk-telekom-anti-bribery-and-anti-corruption-policy.pdf
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

CORPORATE GOVERNANCE INFORMATION FORM

Name(s) of the board member(s) with specific delegated duties and authorities, and descriptions of such duties	3 individuals jointly represent and bind our company in the broadest terms on all kind of matters as below: - Eyüp Engin, Member of the Board of Directors nominated by Group A Shareholder, - One of the Independent Board Members nominated by Group B Shareholder, - Member of 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 7.
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 Onal
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	https://www.kap.org.tr/Bildirim/876576
The name of the section on the corporate website that demonstrates current diversity policy targeting women directors	http://www.ttyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-policies.aspx http://www.ttyatirimciliskileri.com.tr/Documents/en/corporate-governance/women-board-membership-policy.pdf
The number and ratio of female directors within the Board of Directors	0

Composition of Board of Directors

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	Not independent member	04.09.2018	-	Not considered	No	No
Eyüp Engin	Non-executive	Not independent member	22.12.2018	-	Not considered	No	Yes
Yiğit Bulut	Non-executive	Independent member	06.05.2014	https://www.kap.org.tr/tr/Bildirim/358251	Considered	No	Yes
Can Yücel	Non-executive	Not independent member	01.06.2020	-	Not considered	No	Yes
Selim Dursun	Non-executive	Independent member	04.09.2018	https://www.kap.org.tr/tr/Bildirim/708083	Considered	No	No
Dr. Nureddin Nebati	Non-executive	Independent member	02.11.2018	https://www.kap.org.tr/tr/Bildirim/728732	Considered	No	No
Dr. Muammer Cüneyt Sezgin	Non-executive	Not independent member	22.12.2018	-	Not considered	No	Yes
Aclan Acar	Non-executive	Not independent member	07.03.2019	-	Not considered	No	Yes
Ertuğrul Altın	Non-executive	Not independent member	12.03.2019	-	Not considered	No	No

4. BOARD OF DIRECTORS-II

4.4. Meeting Procedures of the Board of Directors

Number of physical board meetings in the reporting period (meetings in person)	12
Director average attendance rate at board meetings	96.3%
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. http://www.ttyatirimciliskileri.com.tr/ / "Corporate Governance" / "Articles of Association and Trade Registry Information" http://www.ttyatirimciliskileri.com.tr/en-us/corporate-governance/pages/articles-of-association-trade-registry-information.aspx
Number of maximum external commitments for board members as per the policy covering the number of external duties held by directors	-

4.5. Board Committees

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 Sector
Link(s) to the PDP announcement(s) with the board committee charters	Audit Committee : https://www.kap.org.tr/en/Bildirim/659174 Nomination Committee : https://www.kap.org.tr/en/Bildirim/803744 Remuneration Committee : https://www.kap.org.tr/en/Bildirim/803744 Early Identification and Management of Risks Committee : https://www.kap.org.tr/en/Bildirim/304033 Corporate Governance Committee : https://www.kap.org.tr/en/Bildirim/741628

CORPORATE GOVERNANCE INFORMATION FORM

Composition of Board Committees-I				
Names Of The Board Committees	Name Of Committees Defined As "Other" In The First Column	Name-Surname of Committee Members	Whether Committee Chair or Not	Whether Board Member or Not
Corporate Governance Committee		Dr. Nureddin Nebati	Yes	Board member
Corporate Governance Committee		Selim Dursun	No	Board member
Corporate Governance Committee		Dr. Muammer Cüneyt Sezgin	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
Committee of Early Detection of Risk		Yiğit Bulut	Yes	Board member
Committee of Early Detection of Risk		Eyüp Engin	No	Board member
Nomination Committee		Dr. Nureddin Nebati	Yes	Board member
Nomination Committee		Dr. Ömer Fatih Sayan	No	Board member
Nomination Committee		Aclan Acar	No	Board member
Remuneration Committee		Yiğit Bulut	Yes	Board member
Remuneration Committee		Eyüp Engin	No	Board member
Remuneration Committee		Dr. Muammer Cüneyt Sezgin	No	Board member

4. BOARD OF DIRECTORS-III

4.5. Board Committees-II

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 http://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/audit-committee.aspx
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 http://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/corporate-governance-committee.aspx
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 Report Section http://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/nomination-committee.aspx
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 Report Section http://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/early-identification-and-management-of-risks-and-committee.aspx
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 Report Section http://www.tyatirimciliskileri.com.tr/en-us/corporate-governance/pages/remuneration-committee.aspx
4.6. Financial Rights	
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.	Corporate Governance / Policies http://www.tyatirimciliskileri.com.tr/Documents/en/corporate-governance/Remuneration_Policy.pdf
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 and to the Senior Executives "

CORPORATE GOVERNANCE INFORMATION FORM**Composition of Board Committees-II**

Names Of The Board Committees	Name of committees defined as "Other" in the first column	The Percentage of Non-executive Directors	The Percentage of Independent Directors In the Committee	The Number of Meetings Held in Person	The Number of Reports on Its Activities Submitted to the Board
Audit Committee		100%	100%	5	6
Corporate Governance Committee		100%	50%	2	-
Committee of Early Detection of Risk		100%	50%	2	-
Nomination Committee		100%	33%	1	-
Remuneration Committee		100%	33%	-	-

SUSTAINABILITY PRINCIPLES COMPLIANCE FORM

Company Compliance Status						Explanation
Yes	Partial	No	Exempted	Not Applicable		
A. GENERAL PRINCIPLES						
A1. Strategy, Policy and Goals						
			X			Within the scope of Enterprise Risk Management, Environmental, Social, Governance (ESG) risk headings are currently followed by related departments. ESG policies will be determined and reported by sustainable management system.
	X					ESG policies approved by the Board of Directors are published on the Company's Investor Relations website. However, there is no separate sustainability policy. Human Rights Policy, Human Resources Policy, Anti-Bribery and Anti-Corruption Policy, Information Security Policy, Purchasing Policy, Integrated Management System Policy, Disclosure Policy, Dividend Policy, Remuneration Policy, Board of Directors Women Membership Policy, Donation Policy, Compensation Policy, Code of Ethics
	X					ESG policies approved by the Board of Directors are published on the Investor Relations website. The implementation is specified in the policies.
	X					All policies have been approved by the Board of Directors and disclosed to the public.
			X			With the implementation of the Sustainability Management System of the Company in 2021, the strategy will be determined and disclose to public in this respect.
			X			With the implementation of the Sustainability Management System of the Company in 2021, long-term targets will be determined and disclose to public in this respect.
A2. Implementation / Monitoring						
		X				Responsible committees and units are determined for some of the published policies and disclosed to the public. Studies on undefined units still continue.
			X			The units responsible for the policies are partially determined and the relevant process management is in preparation.
			X			With the implementation of the Sustainability Management System in 2021, practice and action plans are planned to be created.
			X			With the implementation of the Sustainability Management System in 2021, ESG Key Performance Indicators (KPI) are planned to be determined.

SUSTAINABILITY PRINCIPLES COMPLIANCE FORM

Company Compliance Status						Explanation
Yes	Partial	No	Exempted	Not Applicable		
		X			KPIs are presented together with local and international sector comparisons (in case of verifiable data).	The Sustainability Management System is planned to be implemented in 2021. Making international sector comparisons will be evaluated in the coming years.
		X			Innovation activities for business processes or products and services that improve sustainability performance are explained.	It is planned to start reporting in 2021, with the implementation of the Sustainability Management System.
A3. Reporting						
	X				Sustainability performance, goals and actions have been reported at least once a year and disclosed to the public. Information on sustainability activities have been disclosed in the annual report.	Targets are planned to be disclosed to public with the sustainability report which is planned to be published in 2021. Türk Telekom determines annual targets for electricity and fuel consumption to be reduced. These targets are included in the employees' and senior managements' target cards but have not been disclosed to public. Information related to sustainability activities is explained under the Sustainability section of the annual report.
	X				In order for the stakeholders to understand the position, performance and development of the partnership, important information have been shared in a direct and concise manner (Detailed information and data can also be explained on the corporate website, and separate reports that directly meet the needs of different stakeholders can be prepared.).	Important developments are included under the sustainability section related to efficiency, water and waste management, occupational health and safety, corporate social responsibility. It is planned to start reporting in 2021, with the implementation of the Sustainability Management System.
	X				Maximum care has been taken in terms of transparency and reliability in disclosures and reporting. Within the scope of the balanced approach, all kinds of developments about material issues in disclosure and reporting have been objectively explained.	The company has adopted the principle of transparency and meeting the requirements of the legislation principle on the disclosure of matters which can influence investors' decision and share of the financial and operational data.
			X		Information was provided on which of the United Nations Sustainable Development Goals the activities are related to.	Türk Telekom is a participating member of UNGC. With the sustainability report which is planned to be published in 2021, associations with developments goals will be announced.
			X		Disclosures have been made regarding the lawsuits filed and / or concluded against ESG issues.	With the implementation of the Sustainability Management System in 2021, reporting will be evaluated.
A4. Verification						
	X				Sustainability performance measurements have been disclosed to the public, if verified by independent third parties (independent sustainability assurance providers).	Within the scope of Türk Telekom's CDP reporting in 2020, emission calculations resulting from Company activities has been verified by an authorised independent organisation. On the other hand, there is no verification related to sustainability because there is no reporting on sustainability.
B. ENVIRONMENTAL PRINCIPLES						
	X				Policies and practices, action plans, environmental management systems (ISO 14001) and programs created within the scope of environmental management have been explained.	Türk Telekom operates within the scope of ISO 14001 Environmental Management System and ISO 45001 Occupational Health and Safety Management System. The details of the program have not been disclosed.
	X				Compliance with the environment and related laws and other relevant regulations has been achieved and the work done has been explained.	Türk Telekom fully meets the legal requirements as required by the environmental law. In addition to legal processes, Türk Telekom operates within the scope of ISO 14001 Environmental Management System and ISO 45001 Occupational Health and Safety Management System.

Company Compliance Status						
	Yes	Partial	No	Exempted	Not Applicable	Explanation
In the report prepared within the scope of Sustainability Principles, the limitations regarding the limit of the environmental report included, reporting period, reporting date, data collection process and reporting conditions have been included.			X			It is planned to be disclosed in 2021 with the sustainability report.
The highest level responsible regarding environment and climate change, relevant committees and duties of them have been explained.			X			With the implementation of the Sustainability Management System of the Company in 2021, an authorised committee will be established and highest level responsible will be determined in this manner.
Incentives offered to employees for the management of environmental issues, including the achievement of goals, are explained.			X			With the implementation of the Sustainability Management System of the Company in 2021, activities will be carried out in this manner.
How environmental problems are integrated into business goals and strategies is explained.			X			With the implementation of the Sustainability Management System of the Company in 2021, activities will be carried out in this manner.
Sustainability performances for business processes or products and services and activities to improve these performances are explained.			X			With the implementation of the Sustainability Management System of the Company in 2021, practice and action plans are planned to be created.
It is explained not only in terms of direct operations, but also how environmental issues are managed throughout the partnership value chain and how suppliers and customers are integrated into strategies.			X			With the implementation of the Sustainability Management System of the Company in 2021, activities will be carried out in this manner.
Whether or not to participate in policy-making processes on environmental issues (sectoral, regional, national and international); Cooperation with affiliated associations, related organisations and non-governmental organisations in the field of environment, duties and activities supported, if any, are explained.		X				Türk Telekom is a participant member of UNGC.
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 wastewater management, waste management, biodiversity impacts), information on environmental impacts has been reported periodically in a comparable manner.	X					Türk Telekom reports to CDP. CDP reports are available on the Investor Relations website.
The standard, protocol, methodology and base year details used to collect and calculate the data are explained.			X			Türk Telekom reports to CDP. CDP reports are available on the Investor Relations website.
The status of environmental indicators (increase or decrease) for the reporting year in comparison with previous years has been disclosed.		X				Türk Telekom reports to CDP. CDP reports are available on the Investor Relations website by years, so comparison shall be made.
Short and long-term goals have been determined to reduce environmental impacts and these goals (It is recommended that the targets be determined based on scientific methods as suggested by the United Nations Conference of the Parties on Climate Change). It provided information on the issue, if there are any progress achieved in the reporting year in line with the previously set targets			X			The targets are planned to be disclosed in 2021 with the sustainability report. Progress in the coming years is planned to be announced.
The strategy and actions to combat the climate crisis have been explained.			X			It is planned to be disclosed in 2021 with the sustainability report.

SUSTAINABILITY PRINCIPLES COMPLIANCE FORM

Company Compliance Status						Explanation
Yes	Partial	No	Exempted	Not Applicable		
			X			It is included in the sustainability report business plans which will be published in following years.
	X					The actions taken to reduce environmental impacts, the total number of projects and initiatives carried out, and the environmental benefits / benefits and cost savings provided by them are explained. Actions and projects carried out to reduce environmental impacts are provided in the Sustainability section of the Annual Report.
	X					Total energy consumption data (excluding raw materials) are reported and energy consumption is given in the report as Scope-1 and Scope-2. Emission calculation resulting from Scope 1, Scope 2 and Scope 3 is included in the CDP report.
		X				Information was given on electricity, heat, steam and cooling data generated and consumed in the reporting year. Information about the electricity and fuel consumption is provided in the CDP report.
			X			Studies on increasing the use of renewable energy, transition to zero or low carbon electricity have been carried out and these studies have been announced. Türk Telekom takes utmost care to increase renewable energy usage and reduce carbon emissions. Information in this context is provided in the Sustainability section of the Annual Report and CDP Report.
			X			Renewable energy production and usage data were announced. Renewable energy production and some data are included in the CDP report. It is planned to be disclosed in detail with the implementation of the sustainability system.
	X					Energy efficiency projects have been carried out and the amount of energy consumption and emission reduction achieved through these studies has been announced. Details of Zero Waste and waste management related to energy efficiency is provided under Sustainability section of the Annual Report and in the CDP report. More detailed information is planned to be disclosed in 2021 sustainability report.
			X			The amount of water withdrawn, used, recycled and discharged from underground or aboveground, its sources and procedures (Total water withdrawal by source, water sources affected by water withdrawal; percentage and total volume of recycled and reused water, etc.) have been reported. The Company carries out studies regarding the recycling of used water and not reported yet.
					X	It is explained whether the operations or activities are included in any carbon pricing system (Emission Trading System, Cap & Trade or Carbon Tax). The Company is not included in the carbon pricing system due to the sector in which it is located.
					X	Information and details regarding the carbon credits accumulated or purchased during the reporting period have been announced. The Company is not included in the carbon pricing system due to the sector in which it is located.
					X	If carbon pricing is applied within the partnership, the details of this application have been announced. The Company is not included in the carbon pricing system due to the sector in which it is located.
			X			All mandatory and voluntary platforms where environmental information is disclosed have been announced. With the implementation of the Sustainability Management System of the Company in 2021, it will be evaluated.

Company Compliance Status						Explanation
Yes	Partial	No	Exempted	Not Applicable		
C. SOCIAL PRINCIPLES						
C1. Human Rights and Employee Rights						
Corporate Human Rights and Employee Rights Policy has been established, in which full compliance with the Universal Declaration of Human Rights, ILO Conventions that are confirmed by Turkey and legal framework and legislation regulating human rights and working life in Turkey has been established. The policy and the roles and responsibilities related to its implementation have been disclosed to the public.	X					In 2019, a Human Rights Policy was prepared and announced to all employees to ensure that Türk Telekom fully complies with the United Nations Universal Declaration of Human Rights, the Constitution of the Republic of Turkey, the International Labour Organisation (ILO) Conventions and other conventions ratified by the Republic of Turkey, as well as national legislation on human rights and work life. Human Rights Policy and the implementation of the policy has been disclosed to the public.
Equality of opportunity is ensured in recruitment processes.	X					It is provided in the Company's Human Rights Policy.
Considering also the supply and value chain effects, fair labour, improvement of labour standards, women's employment and inclusion issues (such as women, men, religious belief, language, race, ethnic origin, age, disability, refugee, etc.) have been included in the policies.	X					It is provided in the Company's Human Rights Policy.
Measures taken throughout the value chain to protect the rights of certain economic, environmental, social factors (low- income groups, women, etc.) or minority rights / equality of opportunity are explained.		X				Under the DIVERSITY section of the Human Rights Policy it is disclosed as: "Türk Telekom values diversity and considers this as an asset, and strives to make its employees feel like they are a part of the Company. Accordingly, Türk Telekom fulfils its legal obligations in relation to employment of people with disabilities, and disadvantages." In addition, important developments regarding corporate social responsibility are included in the annual report.
Progress in preventing and corrective practices against discrimination, inequality, human rights violations, forced labour has been reported.	X					It is provided in the Company's Human Rights Policy.
Regulations for not employing child labour have been explained.	X					It is provided in the Company's Human Rights Policy.
Policies regarding investment in employees (training, development policies), compensation, vested benefits, right to unionize, work / life balance solutions and talent management are explained.	X					It is provided in the Company's Human Rights Policy. At the same time, information is included in the Stakeholders and Human Resources sections of the annual report.
Mechanisms for employee complaints and dispute resolution have been established and dispute resolution processes have been determined.	X					The processes are included in detail under the Company's Code of Ethics. At the same time, information is included in the Stakeholders section of the annual report.
Activities carried out to ensure employee satisfaction are announced regularly.	X					The information in this manner is provided in the Human Resources section of the Annual Report.
Occupational health and safety policies have been created and shared with the public.	X					There is an Integrated Management System Policy. It is published on the Company's Investor Relations website.

SUSTAINABILITY PRINCIPLES COMPLIANCE FORM

	Company Compliance Status					Explanation
	Yes	Partial	No	Exempted	Not Applicable	
The precautions taken in order to prevent occupational accidents and to protect health and accident statistics are explained.			X			It is planned to be disclosed in 2021 with the sustainability report.
Protection of personal data and data security policies have been created and shared with the public.	X					The information in this manner is included in the Human Rights Policy and Stakeholders section of the annual report.
Ethical policy (including work, work ethics, compliance processes, advertising and marketing ethics, open disclosure, etc.) has been created and disclosed to the public.	X					Code of Ethics is disclosed to public on the Investor Relations website.
Studies within the scope of social investment, social responsibility, financial inclusion and access to finance have been explained.		X				The information is provided in the Corporate Social Responsibility section of the annual report.
Informative meetings and training programs regarding ESG policies and practices have been held for employees.	X					The Company provides training programs regularly to all its employees on ESG policies.
C2. Stakeholders, International Standards and Initiatives						
Activities in the field of sustainability are carried out by taking into account the needs and priorities of all stakeholders (employees, customers, suppliers and service providers, public institutions, shareholders, society and non-governmental organisations, etc.).	X					Sustainability activities are carried out by taking into account needs and priorities of all stakeholders.
The customer satisfaction policy regarding the management and resolution of customer complaints has been prepared and disclosed to the public.			X			With the implementation of the Sustainability Management System of the Company in 2021, it will be evaluated.
Stakeholder communication is carried out continuously and transparently.	X					Recent announcements such as regulatory disclosures made by Türk Telekom on the Public Disclosure Platform (KAP) are sent simultaneously to the distribution list of the stakeholders, including analysts and investors who opt to receive them. In addition, Communication with all stakeholders is carried out equally and transparently through the channels such as Corporate communication, Marketing communication, Media, Supply Chain etc.
Developments in sustainability activities were explained. The developments in sustainability activities and which stakeholders were communicated with for what purpose, on what subject and how often have been explained.			X			With the implementation of the Sustainability Management System of the Company in 2021, it will be evaluated.
The adopted international reporting standards (Carbon Disclosure Project (CDP), Global Reporting Initiative (GRI), International Integrated Reporting Council (IIRC), Sustainability Accounting Standards Board (SASB), Climate-Related Financial Disclosures Task Force (TCFD) etc.) have been disclosed to the public.		X				Türk Telekom reports to CDP. CDP reports are available on the Investor Relations website.

Company Compliance Status						
	Yes	Partial	No	Exempted	Not Applicable	Explanation
Signatory or member international organisations or principles (Equator Principles, United Nations Environment Program Finance Initiative (UNEP-FI), United Nations Global Principles (UNGC), United Nations Principles for Responsible Investment (UNPRI) etc.), international principles adopted (International Capital Market Association (ICMA) Green / Sustainable Bond Principles etc.) has been disclosed to the public.	X					Türk Telekom became a participant member of UNGC in 2020.
Concrete efforts are made to be included in the Borsa Istanbul Sustainability Index and international sustainability indexes (Dow Jones Sustainability Index, FTSE4Good, MSCI ESG Indexes, etc.).	X					Türk Telekom is included in the BIST Sustainability Index and FTSE4Good Index.
D. CORPORATE GOVERNANCE PRINCIPLES						
Maximum effort is made to comply with all Corporate Governance principles as well as the mandatory Corporate Governance principles within the scope of the Capital Markets Board Corporate Governance Communiqué No. II-17.1.	X					Türk Telekom takes utmost care to implement the principles stipulated in the Corporate Governance Principles issued by the Capital Markets Board. In this context, an independent corporate governance compliance assessment is carried out annually. The company's rating was increased from 94.00 in 2019 to 94.03 in 2020.
While determining the corporate management strategy, the issue of sustainability, the environmental impacts of the activities and the principles on this issue are taken into consideration.		X				Sustainability risks and opportunities regarding Corporate Risk are followed by the Company. Within the scope of implementation of the Sustainability Management System strategy in 2021, it will be taken into account.
As stated in the Corporate Governance Principles, necessary measures are taken to comply with the principles regarding stakeholders and to strengthen communication with stakeholders.	X					Türk Telekom takes utmost care to the communication with stakeholders and adopts transparency principle in its explanations.
Opinions of stakeholders are sought in determining measures and strategies in the field of sustainability.			X			With the implementation of the Sustainability Management System of the Company in 2021, it will be evaluated.
Studies are carried out to raise awareness on the issue of sustainability and the importance of sustainability through social responsibility projects, awareness activities and trainings.	X					Activities carried out in this manner are included in the Corporate Social Responsibility Section of the Annual Report. The Company provides training programs regularly to all its employees on ESG policies.
Efforts are being made to become a member of international standards and initiatives on sustainability and to contribute to studies.	X					Türk Telekom became a participant member of UNGC in 2020.
Policies and programs regarding the fight against bribery and corruption and the principle of tax integrity are explained.	X					Anti-bribery and Anti-corruption policy which is approved by the Board of Directors has been published on the Investor Relations website.

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