

## **TURK TELEKOM GROUP TAX POLICY**

### **INTRODUCTION**

The primary business activity of the Turk Telekom Group (TT Group) is the development and wholesale and retail provision of all types of telecommunications services, as well as any services and products that operate via or in connection with telecommunications systems, both domestically and internationally. In today's business world, taxation is not merely a legal obligation; it is also one of the fundamental elements of corporate sustainability, ethical management, and stakeholder trust. While contributing to our country's economic development, TT Group adopts as a core principle the conduct of all its activities in accordance with the principles of accountability, transparency, legal compliance, and social responsibility.

### **PURPOSE AND BASIS**

The Türk Telekom Group Tax Policy has been established in accordance with applicable laws and regulations and a management philosophy based on integrity. The purpose of this Tax Policy is to ensure that all of TT Group's tax obligations are fulfilled accurately, timely, and transparently within the framework of national legislation (tax laws, circulars, administrative regulations, etc.) and international tax standards (OECD guidelines, BEPS action plans, EU tax transparency principles, etc.). TT Group commits to acting in compliance with tax regulations in all countries where it operates.

### **SCOPE**

This policy applies to all companies in which Türk Telekomünikasyon A.Ş. holds a direct or indirect stake, as well as to executives and employees at all levels, including members of the Board of Directors. The TT Group expects its suppliers and business partners to comply with this policy and to encourage their employees to do the same.

Türk Telekomünikasyon A.Ş. subsidiaries may establish their own policies and processes based on the TT Group Tax Policy.

## **STRATEGY**

In line with its commitment to sustainable and transparent corporate governance, TT Group places legal compliance, accountability, and a sense of public responsibility at the core of its tax policy. The Türk Telekom Group Tax Policy fulfills its tax obligations within an ethical and responsible framework, in a manner that supports the company's long-term sustainable growth approach. TT Group commits to adopting the necessary control mechanisms, through its responsible tax departments, to ensure that all subsidiaries comply with tax legislation and the principles outlined below as part of the proper management of its operations.

TT Group's Tax Department employees are responsible for controlling and managing tax risks in accordance with the principles defined below.

The fundamental principles of the tax strategy are as follows:

### **Tax Management and Risk Management**

Managing tax processes in organizations with high transaction volumes, such as our Company and our Group Companies, is of utmost importance and requires a meticulous approach. For this reason, our objective is to identify tax scopes and risks across all Group Companies, ensure the correct application of tax legislation in our commercial activities, achieve accurate and complete tax compliance, and eliminate risks. The units responsible for managing tax processes within our companies meticulously and continuously monitor every stage. The relevant units under the Deputy General Manager of Finance are responsible for overseeing tax management and work in close collaboration with other departments and business units. Additionally, each Group Company works with Certified Public Accountants, and consultations are held with them regarding tax practices when necessary. The appointed Certified Public Accountants and independent auditors review the tax-related legal books and records within the relevant fiscal year in accordance with tax legislation; any deficiencies or errors are corrected, and as a result, the company's annual income/corporate tax return is filed accurately. In addition to these activities, the Turk Telekom Internal Audit Directorate evaluates financial, accounting, and tax operations processes within Turk Telekom and all Group companies as part of the annual Audit Plan prepared using a risk-based approach, and conducts planned audits in these areas when deemed necessary.

### **Relations with Public Institutions and the Principle of Transparency**

TT Group adopts as a fundamental principle not only the fulfillment of its tax obligations in all countries where it operates in strict compliance with applicable laws, but also acting in accordance with both the letter and the spirit of tax legislation. In its tax practices, the Group adheres to the principle that taxes should be paid in the countries where economic value and profit are generated, and it ensures that tax payments are made in a manner consistent with its commercial activities and revenue-generating processes.

TT Group views tax fairness and a responsible tax approach as an integral part of its corporate governance philosophy; it operates in accordance with the principles of transparency, integrity, and accountability.

TT Group aims to pay an appropriate amount of tax in the countries where economic value is created, in a manner consistent with the nature of its operations and revenue-generating processes, as part of the normal course of its commercial activities and business operations. Tax obligations are fulfilled in accordance with the tax laws and regulations in effect in all countries where the Group operates.

- Our company fulfills all tax obligations completely, on time, and accurately.
- All correspondence and transactions with tax authorities are conducted in accordance with applicable laws and regulations.
- Honesty and transparency are fundamental to our tax filings and reports. Filings are submitted on time and in full.
- Information and documents submitted to tax authorities are accurate, complete, and verifiable.
- Meetings and correspondence with government agencies are regularly maintained in our company records.
- Without compromising the principle of data confidentiality, requested information is shared without delay when required by law.

- Communication with tax authorities is conducted exclusively by authorized personnel within the company.
- New legislation and changes to existing regulations are actively monitored.
- During tax audits, we prioritize transparency, fully cooperate with relevant agencies and authorities, and share the necessary information and documents accurately and completely.

### **Tax Incentive Programs**

TT Group takes advantage of applicable tax incentives in accordance with the relevant legislation. In this context, tax deductions and exemptions are provided through investment incentive certificates obtained for various investments. Additionally, various tax deductions and exemptions are provided for R&D activities.

### **Transfer Pricing Practices**

Transfer Pricing Practices is a process that ensures the prices applied by TT Group in its intra-group transactions are in line with arm's length principles, addressing both tax compliance and financial risk management. In intercompany transactions, the principle of accurately reflecting where value is created is fundamental; in this context, transfer pricing practices are conducted in accordance with the OECD Transfer Pricing Guidelines and the arm's length principle. Pricing for intercompany transactions is determined by considering the functions performed, assets utilized, and risks assumed; these transactions are supported by economic analyses and supporting documentation appropriate to their nature.

### **REVIEW AND REVISION**

The Türk Telekom Group Tax Policy is reviewed and updated by the Deputy General Manager of Finance in accordance with national and international requirements. The updates are approved by the Audit Committee, established within the Board of Directors of Türk Telekomünikasyon A.Ş. and responsible for the oversight and audit of tax policy and tax risks, and then submitted to the Board of Directors for approval. The Board of Directors of Türk Telekomünikasyon A.Ş. assumes responsibility for and oversees the implementation of the Türk Telekom Group Tax Policy.

## **ENTRY INTO FORCE**

The Türk Telekom Group Tax Policy enters into force following its review and approval by the Audit Committee and the Board of Directors.