



ATP YAZILIM VE TEKNOLOJİ ANONİM ŞİRKETİ

DONATION POLICY

1. Scope and Basis

The Donation Policy (“Policy”) of ATP Yazılım ve Teknoloji A.Ş. (“Company” or “ATP”) outlines the principles regarding the donations and aids that the Company will make in accordance with applicable regulations.

This policy has been drafted pursuant to relevant provisions of Capital Markets Law No. 6362, Communiqué on Dividends No. II-19.1, and other applicable capital markets legislation.

The Company acts diligently to implement the Corporate Governance Principles under the Corporate Governance Communiqué.

2. Principles of Donations and Aids

The Company may extend aids and donations to public benefit non-profits or such individuals and organizations in accordance with the relevant provisions of the Communiqué on Dividends No. II-19.1 and other capital markets legislation, provided the resolution is submitted to the shareholders at the general assembly.

In all donations, the Company’s vision, mission and policies and the code of ethics and values should be considered. Donations and aids may be granted in cash and/or in kind.

The upper donation limit is determined by the general assembly. Donations, which must not exceed this limit, are added to the distributable profit base. The Capital Markets Board is the authorized body to impose an upper limit on the donations. The amount of all donations and aid made in each fiscal year and information on the beneficiaries are submitted to the shareholders under a separate agenda item at the general assembly meeting reviewing the activities of the relevant year.