



PRESIDENCY OF  
THE REPUBLIC OF TÜRKİYE

**TÜRKİYE  
WEALTH FUND**

## **SOCIAL INVESTMENT POLICY**

*Approved at the meeting of Board of Directors  
of Türkiye Wealth Fund Management Joint  
Stock Company held on 30 June 2025*

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## **Türkiye Wealth Fund Management Joint Stock Company Social Investment Policy**

### **1. Introduction**

This Social Investment Policy (“**Policy**”) has been adopted to outline the fundamental principles followed by Türkiye Wealth Fund Management Joint Stock Company (“**Company**”) and Türkiye Wealth Fund (“**TWF**”) with respect to generating social benefit and supporting local development.

### **2. Definitions**

**Board of Directors:** Refers to the members of the Company's Board of Directors appointed in accordance with the Article 13 of the Council of Ministers' Decision Regarding the Process and Principles Regarding the Structure and Operation of Türkiye Wealth Fund Management Joint Stock Company, dated October 17, 2016, and in accordance with the procedure specified in Presidential Decree numbered 3.

**Compliance Policy:** Refers to the version of the Compliance Policy that is currently in force, which was adopted pursuant to the Board of Directors’ resolution dated [●] and numbered [●], and which may be amended, where necessary, with the approval of the Ethics Committee.

**Deputy General Management of Human Resources:** Refers to the deputy general management responsible for carrying out human resources functions and activities within the Company and the TWF Companies.

**Directorate of Corporate Communications and Sustainability:** Refers to the department that, by virtue of its functions and responsibilities, reports directly to the General Manager and is responsible for ensuring the integrated management of all processes related to communications and sustainability with the aim of enhancing TWF’s reputation among its stakeholders in line with TWF’s strategic business objectives. It also refers to the corresponding unit in the event of any organizational changes.

**Directorate of Legal, Compliance, and Regulatory:** Refers to the department that reports directly to the general manager and is responsible for ensuring that the Company’s operations are conducted in a regular, efficient, and effective manner, in line with the strategies and policies set by the Board of Directors and in compliance with applicable laws and regulations, and also refers to the corresponding unit in the event of any organizational changes.

**Ethics Committee:** Refers to the committee established within the Company, composed of the general manager, executive directors, and the most senior executive responsible for compliance within the Directorate of Legal, Compliance, and Regulatory with the second most senior employee works on compliance matters within the same Directorate serves as the committee secretary and the committee being responsible for fulfilling the duties assigned to it under the Compliance Policy.

**Portfolio:** Refers to the subsidiaries in which TWF, the Company, or TWF Companies become direct shareholders by (i) establishing them, (ii) acquiring them by paying their cost, or (iii) acquiring them without consideration through administrative arrangements.

**Senior Management:** Refers to the general manager and executive directors of the Company.

**Social Investment:** Social Investment refers to a strategic and integrated approach undertaken by the Company to contribute to sustainable economic development, enhance social welfare, and promote environmental sustainability, in alignment with its long-term institutional value creation objectives and corporate reputation. It encompasses collaborative initiatives and partnerships with public institutions, private entities, civil society organizations, and other relevant stakeholders. This approach is designed to ensure that the Company manages its economic performance in harmony with its environmental, social, and governance responsibilities, thereby delivering measurable and enduring positive impact on society at large.

**TWF Companies:** Refers to the companies and sub-funds incorporated by the Company or TWF as controlling shareholders, which do not have separate legal and compliance departments within their own structures and whose human resources processes are managed by Deputy General Management of Human Resources.

**United Nations Sustainable Development Goals:** Refers to the 17 global goals adopted by the United Nations in 2015, aimed at ending poverty, protecting the planet, and ensuring peace and prosperity for all people by the year 2030.

### **3. Scope of the Policy**

The Company places the goals of serving the nation and generating value at the core of its operations and investments, and acts with the awareness that Türkiye's sustainable economic development can only be achieved through investment in society. In parallel with this approach, the Company expects its Employees, Senior Management, and TWF Companies to consider the impact of their activities on stakeholders, the environment, and society.

In this regard, the Company sets forth under this Policy the fundamental principles it expects Employees, Senior Management, and TWF Companies to adopt in the conduct of their activities.

### **4. Objective of the Policy**

The purpose of this Policy is to declare that the Company prioritizes societal benefit and the United Nations Sustainable Development Goals in its investment decisions and operations, and to set out the fundamental principles governing such approach.

### **5. Core Principles**

In conducting its investments and operations, the Company exercises the utmost care to align with the core principles set forth below and expects the Board of Directors, Senior Management, Employees, and TWF Companies to adopt these principles and integrate them into their operations to the extent applicable:

- The Company acknowledges that both private and public sector actors play a critical role in the sustainable development of society and that companies must act in alignment with the needs and priorities of the communities in which they operate, with due regard for the common good.

- The Company and TWF conduct their investments and operations in line with objectives that align with the United Nations Sustainable Development Goals.
- The Company and TWF, through their Portfolio companies that are participants of the United Nations Global Compact, exercise the utmost diligence to ensure that their investments and operations align with the UN Global Compact Principles. In this context, the Company pays particular attention to matters such as the prohibition of forced labor, the elimination of child labor, and the prevention of discrimination, and fully respects employees' rights to unionize and engage in collective bargaining.
- TWF considers taking into account the development priorities of the local regions where it invests, and contributing to local development initiatives and their financing to the extent possible, as an integral part of its value creation approach.
- TWF aspires to be among the leading sovereign wealth funds in terms of environmental, social, and governance performance, both regionally and globally.
- The Company aims to effectively incorporate environmental, social, and governance principles into its decision-making processes.
- TWF endeavors to establish partnerships with institutions that adhere to environmental, social, and governance principles.
- The Company ensures that its investments comply with all policies and applicable regulations of TWF.

## **6. Trainings**

Where deemed necessary and at appropriate intervals, the Directorate of Legal, Compliance, and Regulatory, Directorate of Corporate Communications and Sustainability and Deputy General Management of Human Resources provide training to Employees on the scope and objective of this Policy, with the aim of raising awareness. Assistance from the sustainability team is sought for these trainings where appropriate.

When deemed necessary, the Directorate of Legal, Compliance, and Regulatory in coordination with the Deputy General Management of Human Resources, organizes additional trainings concerning the subject matter of this Policy. These may include, among others, matters related to environmental, social and governance principles, the United Nations Global Compact, and the United Nations Sustainable Development Goals. Support may be sought from third-party consultants and other relevant departments, and training materials may be updated accordingly.

The organization of the trainings to be delivered under this Policy are overseen by Deputy General Management of Human Resources.

## **7. Approval and Revisions**

The Ethics Committee is authorized and responsible for the periodic review, enhancement, and revision of this Policy. Preliminary work related to any revisions, improvements, or updates to this Policy is carried out by the Directorate of Legal, Compliance, and Regulatory.

The preliminary work carried out by the Directorate of Legal, Compliance, and Regulatory is submitted to the Ethics Committee for approval. Any proposed amendments shall enter into force upon the approval of the Ethics Committee. The updated Policy is communicated to Employees through appropriate channels.