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|  | <b>DIVERSITY, EQUITY AND INCLUSION POLICY</b> | Document Code   | HOL-SUR-POL-01 |
|                                                                                   |                                               | Issue Date      | 10.09.2026     |
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## DIVERSITY, EQUITY AND INCLUSION POLICY

### ARTICLE 1. PURPOSE AND SCOPE

The purpose of this Diversity, Equity and Inclusion Policy (the “Policy”) is to define the approach of Akfen Holding Anonim Sirketi (“Akfen Holding” or the “Company”) and its subsidiaries (Akfen Holding and its subsidiaries collectively referred to as the “Companies”) to diversity, equity and inclusion and to establish the principles and guidelines for creating a fair and inclusive working environment based on equal opportunity across all their activities.

Akfen Holding considers diversity, equity and inclusion to be among the fundamental elements of sustainable corporate success and adopts equity and inclusion as an integral part of its way of doing business. This Policy applies to the Companies’ employees, governing bodies, business partners and all stakeholders within the value chain.

### ARTICLE 2. DEFINITIONS

The specific terms and concepts used in this Policy are briefly defined below:

**Discrimination** refers to unequal treatment of individuals on the basis of gender, age, language, religion, ethnic origin, disability, marital status or any other similar difference.

**UN** refers to the United Nations.

**United Nations Global Compact (UN Global Compact)** refers to the voluntary corporate sustainability initiative launched by the United Nations, which aims to ensure that companies comply with the ten universally accepted principles in the areas of human rights, labour standards, the environment and anti-corruption and integrate these principles into their business processes.

**United Nations Sustainable Development Goals (SDGs)** refer to the 17 fundamental goals established by the United Nations to achieve global objectives such as the eradication of poverty, the reduction of inequalities and the achievement of environmental sustainability by 2030.

**Diversity** refers to the individual characteristics of employees, including gender, age, ethnic origin, cultural background, education, experience, ways of thinking and similar differences, that contribute to organizational richness.

**Value Chain** refers to the network of business relationships comprising employees, suppliers, business partners and all other stakeholders with whom the Companies have direct or indirect relationships within the scope of their activities.

**Equity** refers to a fair and non-discriminatory approach that ensures equal access to opportunities for all employees and candidates in recruitment, remuneration, career development and other business processes.

**ILO** refers to the International Labour Organization.

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**ILO Declaration on Fundamental Principles and Rights at Work** refers to the international declaration adopted by the ILO, which defines the fundamental principles of labour that member states are obliged to respect, promote and support in good faith even if they have not ratified the relevant conventions (freedom of association and right to collective bargaining, elimination of forced or compulsory labour, abolition of child labour, and elimination of discrimination in respect of employment and occupation).

**Human Rights** refer to the fundamental rights and freedoms defined in the United Nations Universal Declaration of Human Rights and the conventions of the International Labour Organization (ILO), and to the rights inherent to all human beings regardless of gender, race, colour, religion, language, age, nationality, differences of opinion or differences in property, including the right to a life of equity, freedom and dignity.

**Women's Empowerment Principles (WEPs)** refer to a set of principles established by the UN Global Compact and UN Women that provide guidance to the business world on how to promote gender equality and women's empowerment in the workplace, marketplace and community.

**Inclusion** refers to a participatory and supportive working environment in which employees, regardless of their differences, feel valued, respected and included in decision-making processes.

**Inclusive Corporate Culture** refers to an organizational structure and pattern of behaviour in which differences are accepted, diversity is supported and all employees are able to contribute equally.

**Gender Equality** refers to the equal enjoyment by individuals of different genders of rights, opportunities and representation in all areas of economic, social and corporate life.

### ARTICLE 3. PRINCIPLES AND GUIDELINES

Akfen Holding implements its approach to diversity, equity and inclusion in line with the United Nations Universal Declaration of Human Rights, the fundamental principles of the International Labour Organization, the United Nations Global Compact (UN Global Compact) and the Women's Empowerment Principles (WEPs); adopts a fair, equitable and inclusive approach across all areas in which it operates; and supports the implementation of these principles throughout all its activities.

#### 3.1. Diversity and Inclusive Corporate Culture

Akfen Holding recognizes that geographical background, skills, experience, ethnic origin, culture, age, gender and diverse perspectives create corporate value and supports the strengthening of diversity at all levels of the organization.

#### 3.2. Diversity in Management and Decision-Making Processes

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Diverse competencies, experience and perspectives are taken into consideration in management and decision-making processes, and diversity is recognized as a key element that strengthens the quality of decision-making processes and the corporate perspective.

Accordingly, an inclusive communication environment is fostered in which employees can freely express their views and suggestions, diverse perspectives are valued, and participation is encouraged.

### 3.3. Equal Opportunity and Fair Practices

It is essential to provide equal opportunities to all employees, candidates and relevant parties.

All human resources processes, including recruitment, appointment, promotion, performance evaluation, career development, training, remuneration and employee benefits, are carried out solely on the basis of competencies, experience, performance and the requirements of the relevant role.

Discrimination on the basis of gender, age, language, religion, ethnic origin, disability, marital status or any other similar difference is not tolerated, and the implementation of practices aimed at strengthening equal opportunity is encouraged.

### 3.4. Gender Equality

Akfen Holding acts in line with **SDG 5 – Gender Equality**, one of the United Nations Sustainable Development Goals, and is committed to complying with the principles of the International Labour Organization (ILO).

In this context, the Women's Empowerment Principles (WEPs) serve as a guide for efforts aimed at strengthening gender equality in the workplace, throughout the Companies' business processes and across the value chain.

Women's participation in working life, career development and representation in decision-making mechanisms are supported, and awareness-raising efforts aimed at reducing gender-based biases are carried out.

An inclusive and gender-sensitive approach is adopted in internal and external communications, and gender equality is taken into consideration throughout all business processes.

Akfen Holding encourages the development of practices that support gender equality in recruitment, career development, remuneration and access to leadership positions.

### 3.5. Safe and Respectful Working Environment

It is essential to ensure a safe and respectful working environment for all employees, free from harassment, discrimination, violence, bullying, pressure, threats and similar inappropriate behaviour.

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No behaviour that may undermine inclusion or adversely affect the dignity or psychological or physical integrity of employees is tolerated, and a zero-tolerance approach is adopted towards such situations.

Relevant reports are handled in accordance with the principles of confidentiality, impartiality and fairness, and the necessary disciplinary and/or legal processes are initiated.

### 3.6. Awareness and Continuous Improvement

Awareness-raising training, communication activities and development programs are carried out to promote the adoption of the diversity, equity and inclusion approach throughout the organization.

Employees are encouraged to develop unbiased, respectful and inclusive behaviours, and practices in this area are regularly reviewed and further developed in line with the principle of continuous improvement.

### ARTICLE 4. CONTACT

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### ARTICLE 5. EFFECTIVE DATE

This Policy was adopted pursuant to the resolution of Akfen Holding's Board of Directors dated 10.09.2026 and entered into force on the date of its publication.

This Policy shall remain in force unless repealed or amended by the Board of Directors.

### ARTICLE 6. RELATED POLICIES AND PROCEDURES

Human Rights Policy  
Human Resources Policy  
United Nations Global Compact and Compliance Policy  
Gender Equality Policy  
Board Diversity Policy  
Business Ethics Rules and Codes of Ethics