

GALATA WIND ENERJİ A.Ş.
DONATION, AID, AND SPONSORSHIP POLICY

1. PURPOSE and PRINCIPLES

Galata Wind Enerji A.Ş. (“**Galata Wind**” or “**the Company**”) does not limit its activities solely to commercial success; we consider managing our impact on the communities and ecological environment in which we operate to be a fundamental responsibility. Accordingly, the purpose of our Donation, Aid, and Sponsorship Policy (“**Policy**”) is to contribute to social, environmental, and economic development in line with our company’s strategic sustainability goals and to structure our support mechanisms for community welfare and economic development with a transparent and accountable management approach.

This policy aims to provide effective, measurable, solution-oriented, and lasting contributions in areas such as raising awareness and/or supporting disadvantaged groups in solving social problems, in line with Galata Wind's social participation management approach.

Our donation, aid, and sponsorship activities are carried out in line with the following basic principles:

Alignment with Sustainability: Galata Wind ensures that all in-kind and cash support is aligned with the company's long-term sustainability goals aimed at creating positive change in its environmental and social impact area.

Transparency and Accountability: Galata Wind conducts its donation, aid, and sponsorship processes in accordance with Galata Wind policies, the Turkish Commercial Code (“TCC”), the Capital Markets Law (“CML”), and the Capital Markets Board (“CMB”) Regulations and Decisions, the Turkish Code of Obligations (“TBK”), Tax Laws, other relevant legislation, the Articles of Association, and General Assembly Resolutions, and makes all processes auditable by keeping records.

Fair and Ethical Approach: Galata Wind selects institutions and organizations to receive in-kind and cash support without discrimination, in accordance with ethical rules and based on objective criteria determined in line with the Company's strategic priorities.

Local and Global Impact: Galata Wind supports programs and platforms that align with global sustainability goals, primarily social development programs in the regions where it operates, and collaborates with partners in such programs.

Stakeholder Participation: When determining its donation, aid, and sponsorship activities, the Company acts by regularly taking into account the expectations and feedback of its employees, business partners, and other key stakeholders.

This policy aims to ensure that Galata Wind fulfills its corporate values and responsibilities to society at the highest level. The Investor Relations Manager and the Corporate Governance Committee are responsible for the implementation, monitoring, and necessary updates of the policy.

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2. DEFINITIONS

The following terms shall be used in the Donation, Aid, and Sponsorship Policy with the meanings specified below:

Donation: Support provided by Galata Wind to individuals and institutions (such as associations, unions, foundations, other non-profit organizations), universities, educational institutions, scientific research centers, and similar institutions and organizations, in cash or in kind (such as the provision of products or services), without expecting anything in return, in order to serve the public interest and contribute to the achievement of a social goal.

Aid: Contributions made in cash or in kind (such as the provision of products or services) to non-profit organizations or disadvantaged communities in cases of urgent need or to contribute to social development.

Sponsorship: In line with Galata Wind's strategic goals and brand value, these are contributions in kind or cash (such as the provision of products or services) made to promote and raise awareness in areas such as art, sports, social, education, culture, environment, and technology, where participation is deemed beneficial for corporate gain.

In-Kind Support: Refers to contributions that do not carry monetary value but are provided as goods, products, or services. These contributions may include equipment donations, logistical support, and technical services.

Cash Support: Contributions transferred to designated institutions or programs via money transfers, whose purpose and objectives may also be determined by protocols and agreements.

Eligible Organizations:

Within the scope of social participation practices, the Company may provide support to the following entities, provided that such support does not interfere with its purpose and subject matter, and in accordance with the provisions of the Turkish Commercial Code, Capital Markets Board Regulations and Decisions, Turkish Code of Obligations, Tax Laws and other relevant legislation, as well as the Company's Articles of Association and General Assembly Resolutions:

- a) Departments included in the general budget, administrations with supplementary budgets,
- b) Provincial special administrations,
- c) Municipalities and villages,
- d) Foundations granted tax exemption by the Council of Ministers,
- e) Associations deemed beneficial to the public interest,

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f) Institutions and organizations engaged in scientific research and development activities, universities, educational institutions, and similar persons or institutions,

may be made donations and Aid.

Excluded Organizations and Activities: This covers areas that will not be supported or funded by Galata Wind. The company does not support political parties and structures, or any organization that discriminates or violates human rights. At the same time, it does not provide donations, aid, or sponsorship to institutions and organizations that are associated with tobacco, alcohol, gambling, and illegal activities, even if their connection to such activities was established in the past.

Impact Assessment: These are analyses and reporting processes carried out to assess the alignment of donation, aid, and sponsorship activities with the company's strategic goals and their social benefit, which the company may deem appropriate and request when necessary.

Approval Processes: These are processes that ensure donations, aid, and sponsorship activities are carried out in accordance with laws and regulations and Company policies, requiring the approval of the relevant committee and board of directors.

Stakeholders: Individuals, institutions, and organizations directly affected by Galata Wind's activities and directly affecting the company's activities. These stakeholders have been identified according to a specific methodology and are disclosed on the company's official website.

Impact Area: The social and ecological environment affected by Galata Wind's activities. The company carries out priority work in line with its impact area. These priorities are shared publicly as part of the company's sustainability strategies.

3. SCOPE AND AREA OF APPLICATION

A provision in the articles of association is required for Galata Wind to make donations. The limit of donations and aid to be made is determined by the general assembly in cases not specified in the articles of association. The upper limit for donations and aid to be made in accordance with Capital Markets Legislation and within the framework of the principles specified in the Company's Articles of Association is determined by the General Assembly upon the recommendation of the Board of Directors. The Board of Directors is authorized to make donations and aid within the determined upper limit. Donations and aid exceeding the limit determined by the General Assembly cannot be made, and donations and aid made within an accounting period are added to the net distributable profit base for the relevant accounting period.

In accordance with this Policy and the principles determined by the legislation to which it is subject, the Company presents all donations and aid made within each accounting period to the shareholders for their information as a separate agenda item at the General Assembly Meeting of the relevant year.

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Galata Wind may make donations and contributions in accordance with Capital Markets Legislation, provided that the “net distributable period profit” has been calculated based on the most recently publicly disclosed financial statements. Donations and contributions made by the Company shall not constitute a transfer of hidden profits as defined in the Capital Markets Law and the SPK's Regulations and Decisions, and the TTK, TBK, and other relevant legislation, and the necessary special situation disclosures must be made in accordance with the SPK and the SPK's Regulations and Decisions, and donations and aid made during the year must be presented to the shareholders at the ordinary general meeting. Galata Wind subsidiaries and affiliates whose shares are not traded on Borsa Istanbul A.Ş. may make donations and contributions provided that the “net distributable period profit” has been calculated based on the latest finalized monthly cumulative financial statements prepared in accordance with the legal records kept under the Turkish Commercial Code and Tax Laws. Galata Wind may establish social foundations for its members, participate in such foundations, and provide assistance.

Galata Wind Enerji A.Ş. Donation, Aid, and Sponsorship Policy applies to all regions and countries where the Company operates and forms the basis for principles, governance mechanisms, decision-making processes, and audit procedures regarding donation, Aid, and sponsorship activities. All necessary arrangements are made in accordance with this policy.

3.1. Donation, Aid, and Sponsorship Headings

Within the scope of this policy, the areas that Galata Wind may support are listed below. However, new headings may be included in the scope after evaluation by the Corporate Governance Committee if the necessary impact area analyses are carried out in line with the Company's priorities.

Environmental and Climate Solutions: Programs aimed at reducing carbon emissions, access to renewable energy, protecting biodiversity, sustainable use of natural resources, and circular economy initiatives.

Education and Scientific Research: Raising awareness on renewable energy and environmental sustainability, educational scholarships, joint research with universities, and educational programs for young people.

Social Participation and Equality: Increasing access to energy for disadvantaged groups, strengthening the role of women and youth in the energy sector, and working towards gender equality and equal opportunities in education.

Health and Safety: Energy efficiency projects that support public health, and initiatives that provide access to clean air and water.

Arts, Culture, and Sports: Cultural events aimed at raising environmental awareness and sustainability-focused sports activities, contribution and awareness programs with defined improvement goals that positively contribute to social health and well-being.

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3.2. Areas Not Supported

Galata Wind does not provide donations, aid, or sponsorship to the following organizations and/or activities:

- Organizations that violate human and animal rights
- Organizations engaged in activities that harm the ecological environment, have been proven to cause harm, or have a social perception in this direction
- Political parties, political candidates, or political campaigns
- Organizations that promote tobacco, alcohol, gambling, and any kind of illegal activity
- Initiatives that cause discrimination or threaten social equality.

4. EVALUATION

Galata Wind Enerji A.Ş. manages its donation, aid, and sponsorship processes in line with its sustainability strategies and social participation goals. In its resource allocation processes, it acts with the goal of increasing environmental, economic, and social contributions in the regions where it operates. The following elements are taken into account in the decision-making process. Requests that do not meet these criteria are not included in the evaluation process.

4.1. Renewable Energy and Climate Impact

Supported projects or organizations must be consistent with the goals of increasing access to clean energy, reducing carbon emissions, and promoting environmental sustainability.

4.2. Social Contribution and Participation

Priority is given to activities that improve the welfare of disadvantaged groups, provide equal opportunities in education, or support the integration of women and young people into the energy sector.

4.3. Geographic Focus

Donations, aid, and sponsorships should primarily support social and economic development in the regions where Galata Wind operates.

4.4. Transparency and Accountability

Organizations receiving support must comply with financial reporting standards, be subject to independent audit, and have clearly traceable activities.

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4.5. Impact Assessment

Donations, aid, or sponsorship activities must create long-term change and have measurable impact.

5. DECISION-MAKING

Decisions regarding donations, aid, and sponsorship are evaluated in accordance with the processes determined within Galata Wind's corporate governance structure:

5.1. Setting Upper Limits by the General Assembly

Within the framework of the annual donation and aid budget proposed by the Board of Directors, an upper limit is set with the approval of the General Assembly.

5.2. Initial Evaluation

Requests received are subject to a preliminary assessment based on criteria determined by the relevant units. The financial and operational reliability of the institution is examined.

5.3. Impact and Compliance Analysis

The compatibility of the requested type of support with Galata Wind's strategic priorities is evaluated. The past projects, activities, and societal impact of the organization to be donated to, assisted, or sponsored are examined.

5.4. Management Approval

In line with budgetary and regulatory compliance, donation, aid, and sponsorship proposals are submitted to the Board of Directors for approval within the specified limits.

5.5. Monitoring and Reporting

Regular reports are prepared on the proper and effective use of resources in approved donations, aid, and sponsorships. The results of the supported projects are measured and shared with stakeholders. Financial impact assessments are requested when necessary.

6. DONATIONS, AID, AND SPONSORSHIP IN SUPPLIER RELATIONSHIPS

Requesting donations, Aid, or sponsorship from suppliers and other solution partners to support our initiatives is only possible with the decision of the company's Corporate Governance Committee. However, the following principles must be followed in relations with suppliers:

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- Suppliers and/or other solution partners cannot be pressured to make donations or provide aid to any Galata Wind social participation program or platform, purchase tickets for sponsorship events, or provide sponsorship for events organized by Galata Wind.
- In cases where our suppliers collaborate in any initiative as a joint sponsor, their role as a sponsor must be clearly and appropriately approved and disclosed by Galata Wind.

7. APPROVAL AND REVIEW

Within this framework, Galata Wind undertakes to continuously review its donation, aid, and sponsorship policy and to act in accordance with the highest ethical and sustainability standards.

This Policy was approved by the Galata Wind Enerji A.Ş. Board of Directors on December 12, 2025, under decision number 2025/30. With the entry into force of this Policy, previously published policies are repealed.