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OPET

**COMPETITION LAW COMPLIANCE
POLICY**

Table of Contents

1. Purpose and Scope.....	2
2. Definitions	2
3. General Principles	3
4. Application of the Policy	3
4.1. Rules to Be Considered in Relationships with Competitors	3
4.2. Rules to Be Considered in Case of Dominant Position	4
4.3. Rules to Be Considered in Relationships with Customers, Retailers and Suppliers.....	4
4.4. Mergers, Acquisitions and Joint Venture Transactions of Companies	4
4.5. Use of Press, Media and Other Social Communication Channels	4
4.6. Communication with Competition Authority Officials During the On-Site Inspections	5
4.7. Training and Monitoring	5
5. Authority and Responsibilities	5
6. Revision History	6

1. Purpose and Scope

The purpose of this Competition Law Compliance Policy ("the **Policy**"), which is an integral part of the Opet Code of Ethics¹ is to set the principles and rules for the conduct of all activities within Opet in compliance with competition law. This Policy aims to ensure that all processes and practices of Opet comply with competition law and to raise awareness on competition law. This Policy is an indication of importance that Opet acts in accordance with competition law while conducting its commercial activities and relations with competitors.

All employees and managers of Opet shall comply with this Policy. Business Partners are also expected to act in accordance with the principles of this Policy to the extent applicable to the relevant transactions.

This policy has been prepared in accordance with the Code of Ethics and Values of Opet's Principal Shareholders.

2. Definitions

"Abuse of Dominant Position" is defined as the abuse of the dominant position by undertakings to restrict competition in the market. Examples of these practices include obstructing competitors in the market, preventing undertakings entering the market, refusing to supply goods and services, discriminatory practices, making the sale of one product conditional on the sale of another product and applying excessive pricing.

"Anti-Competitive Agreement" refers to express or implied agreements between undertakings, which may be written or oral, and cover issues such as price determination, determination of production amount, market and customer sharing.

"Business Partners" includes suppliers, retailers, all kinds of representatives, subcontractors and consultants acting on behalf of the company.

"Competition" is the contest between undertakings in markets for goods and services, which enables them to take economic decisions freely,

"Competitively Sensitive Information" refers to any information that, if shared with competitors, may distort, restrict the competition and/or cause this effect which includes, but not limited to, information on price, quantity, customers, costs, turnover, sales, purchases, capacity, product qualifications, marketing plans, risks, investments, technologies, innovation and R&D programs and other similar information.

"Concerted Practice" refers to direct or indirect relationship that provides a coordination or practical cooperation that replaces the independent behaviour of the undertakings, where there is no agreement between undertakings.

"Dominant Position" means the power of one or more undertakings in a particular market to determine economic parameters such as price, supply, the amount of production and distribution, by acting independently of their competitors and customers.

"Koç Group" refers to all companies controlled directly or indirectly by Koç Holding A.Ş., individually or jointly, and the Joint Ventures included in the consolidated financial report of Koç Holding A.Ş.

"Opet" means all companies controlled solely or jointly by Opet Petrolcülük A.Ş. and Opet Petrolcülük A.Ş., either directly or indirectly by holding 50% or more than 50% of their shares.

"Principal Shareholders" refers to Türkiye Petrol Rafinerileri A.Ş. and Öztürk Yatırım ve Turizm A.Ş.

"Undertaking" is a natural and legal person who produces, markets and sells goods or services in the market, and a unit which can decide independently and constitute an economic whole.

¹ For detailed information, please refer to the Opet Code of Ethics.

3. General Principles

Opet employees and Business Partners are expected to carry out their business in accordance with the law in countries where they operate, Opet Code of Ethics and this Policy. Acting in accordance with competition law regulations is a crucial part of the duties and jobs of all managers and employees.

Opet,

- regularly monitors the compliance of its activities with the competition law.
- takes necessary actions regarding the management of competition law compliance risk.
- carries out necessary training and supervision activities to raise the awareness of employees and managers regarding competition law.

Within the framework of this Policy, Opet employees, managers and Business Partners are required; not to be engaged in Anti-Competitive Agreements and Concerted Practices with competitors, not to act in line with the anti-competitive decisions of the association of undertakings, not to share information that may cause inconveniences with competitors in terms of competition law and to act carefully regarding the Abuse of Dominant Position.

Violation of this Policy may result in serious consequences, for Opet, its related managers, employees and its Business Partners, including legal, administrative and criminal sanctions depending on the legislation in the region of operation, and most importantly, this may seriously damage to the reputation of Opet.

4. Application of the Policy

4.1. Rules to Be Considered in Relationships with Competitors

It is forbidden to make agreements or engage in behaviours having the nature of Concerted Practices, with a competitor company manager or employees which have as their object or effect or likely effect the prevention, distortion or restriction of competition directly or indirectly. Anti-Competitive Agreements with competitors such as allocation of customers and territories, restricting the amount of supply and bid rigging are also prohibited.

Attention should be paid to the language used in in-company correspondence and interaction with competitors and Competitively Sensitive Information must not be shared with them.

Particular attention must be taken in any contact with the employees of competitors. Especially in meetings where competitors come together such as associations, councils, trade associations; in the case of anti-competitive speeches by others, such sharing must be immediately warned, if the speeches continue the meeting must be abandoned and this situation must be recorded and Opet Legal and Compliance Leadership must be informed concerning what needs to be done afterwards.

Opet Legal and Compliance Leadership must be consulted before responding to requests from competitors that carry the risk of violation of competition rules; it must not be kept silent and it must be documented that Opet cannot be a party to such an agreement by informing the parties in written that such requests are not compatible with competition rules and that the request cannot be answered positively.

Information regarding competitors; could be, in accordance with the law, obtained from publicly available sources such as press releases, public annual reports, official records, trade journals, speeches by company executives. If these sources which contain information about competitors in presentations, reports and similar documents prepared by Company are used; the legitimate source of this information must be clearly and explicitly stated.

4.2. Rules to Be Considered in Case of Dominant Position

In cases where Opet holds a Dominant Position in the different markets in which it operates, employees shall conduct their activities with due diligence in accordance with the requirements of the Dominant Position. Although the determination of dominant position is evaluated separately for each market based on the market shares of undertakings, competitors and some specific factors, Opet should avoid the following practices that can be regarded as an abuse if it is in a position that can be considered as dominant in a market in which it operates:

- Implementing pricing strategies that exclude competitors from the market or discriminate against specific customers such as offering non-objective loyalty discounts to increase the number of sales.
- Requiring the purchase of one product conditional on the purchase of another product.
- Refusal to provide goods or services without objective grounds.
- Conduct activities to prevent competing undertakings operating in the market or seeking new entry into the market.
- Providing different terms for similar acts to equal buyers.
- Imposing excessive pricing and/or offering contracts that contain unfair commercial terms.
- Signing long-term exclusivity agreements. (Time restrictions concerning this subject may vary depending on the market of the relevant service/product. Opet Legal and Compliance Leadership must be consulted, prior to signing such agreements.)

4.3. Rules to Be Considered in Relationships with Customers, Retailers and Suppliers

Employees and managers of Opet respect the freedom of retailers in the sector in which they operate to set their own sales prices, profit and discount rates, and strictly avoid any actions and statements that may create the impression that this freedom is restricted. They ensure that anti-competitive activities, particularly in terms of region or customer restrictions, are not carried out within the scope of the distribution system applied, and act within the framework of agreements that comply with competition rules in its relations with suppliers.

Being aware of the fact that retailers and suppliers are competitors of each other, it should be careful against all kinds of statements and actions that may constitute Competitively Sensitive Information, Concerted Practices or Anti-Competition Agreement between these undertakings, and necessary warnings should be made to the relevant parties to avoid such interaction and transactions.

4.4. Mergers, Acquisitions and Joint Venture Transactions of Companies

The merger of two or more companies or the change in control of a company in whole or in part (through the purchase of shares or assets), or the establishment of a joint venture may, in certain conditions, be subject to the permission of the competition authorities. The transaction that are subject to notification are completed without the authorization of competition authorities; this creates a risk that the transaction could be legally invalid and/or administrative fines are imposed. In the preliminary stages of a planned merger, acquisition or joint venture transactions by Opet, before signing any contract or a written commitment, Opet Legal and Compliance Leadership and Koç Holding Legal and Compliance Department must be informed in order to carry out the necessary assessment.

4.5. Use of Press, Media and Other Social Communication Channels

Employees and managers of Opet act very carefully in their posts in press, social media and other communication channels as a part of compliance with the Policy. In terms of exchanging Competitively

Sensitive Information with competitors, these channels are places to be extremely crucial. Undertakings should avoid, through such channels, sharing one-sided information sharing with competitors such as future price, stock and campaigns that may be qualified as Competitively Sensitive Information.

4.6. Communication with Competition Authority Officials During the On-Site Inspections

In case of an on-site competition law inspection concerning Opet, it is crucial to cooperate with competent Competition Authority officials. Severe administrative and legal sanctions may be imposed in cases where the on-site inspections are hindered or complicated. The following issues should, however, be considered in order to protect the rights of Opet during on-site inspections:

- Request to see the authorization documents of the officials who is in charge of the inspection and note their names, institutions and the time they came to the company.
- Immediately contact Opet Legal and Compliance Leadership, as well as Koç Holding Legal and Compliance Department.
- Direct officials to the Legal and Compliance Leadership or a senior executive.

If Competition Authority officials request information or ask questions by ways of phone/e-mail etc., direct immediately their call to the Legal and Compliance Leadership.

4.7. Training and Monitoring

Opet is required to abide the following provisions:

- Regularly provide the necessary trainings on competition law to all employees,
- Adapt this Policy, if necessary, according to the needs of the company and to prepare the necessary procedures.

Opet's Competition Compliance and Legal Affairs Leadership:

- Reviews the content of the Company's own procedures and trainings, and monitors their completion status, in coordination with Opet Legal and Compliance Leadership,
- Submits an annual training report to Opet Legal and Compliance Leadership and Koç Holding Legal and Compliance Department.

5. Authority and Responsibilities

All employees and managers of Opet are responsible for complying with this Policy, implementing and supporting the relevant Opet's procedures and controls in accordance with the requirements in this Policy. Opet also expects and takes necessary steps to ensure that all its Business Partners to the extent applicable comply with and/or acts in line with this Policy.

If there is a discrepancy between the local regulations applicable in the countries where Opet operates, and this Policy, subject to such practice, not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Koç Group Code of Ethics and Opet Code of Ethics, you may seek guidance or report this incident to your line managers. Alternatively, you may report the incident to Koç Holding's Ethics Hotline, which is

managed by independent service providers and operates 24/7, by calling 0850-577-1926 and 0850-220-3845², or via the web-based reporting system at: “koc.com.tr/hotline”

Opet employees may consult Opet Legal and Compliance Leadership for their questions related to this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties who are expected to comply with this Policy, their contracts may be terminated.

6. Revision History

This Policy entered into force with the Board of Directors’ Resolution dated 15.04.2022, and Opet Legal and Compliance Leadership is responsible for updating the Policy.

Revision	Date	Comment
No:1	10.06.2024	The name of the Legal and Compliance Group Directorate has been revised
No:2	12.05.2026	Unit names have been revised.

² Information on phone numbers, the countries covered, and the languages in which services are provided is available at ‘koc.com.tr/ihbarbildirim’.