

Policy No	Policy Name: Diversity, Equity and Inclusion Policy
Objective and Definitions	<p>1. This diversity, equity and inclusion policy's ("Diversity Policy") objective is to set forth the rules and procedures of D-Market Elektronik Hizmetler ve Ticaret A.Ş. ("Hepsiburada" or the "Company") concerning diversity.</p> <p>2. The Company's aim is to encourage and support diversity, equity and inclusion and actively promote a culture that values difference and eliminates discrimination in our workplace. It applies to all aspects of employment with the Company, including recruitment, pay, benefits and conditions, flexible working and leave, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures and termination of employment.</p>
Scope Responsibility	<p>3. This Diversity Policy applies to all areas of the Company's business.</p> <p>4. All employees, directors, management and officers of the Company and agents, affiliates and representatives acting on behalf of the Company ("Stakeholders") shall act in accordance with this Diversity Policy.</p> <p>5. The Management is responsible for ensuring that the principles and fundamentals of the Diversity Policy become the way of doing business of the units they direct and that necessary steps are taken immediately and decisively in case of non-compliance.</p>
Policy Terms	<p>6. Discrimination:</p> <p>6.1. Stakeholders must not unlawfully discriminate against or harass other people, including current and former staff, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts) and on work-related trips or events including social events.</p> <p>6.2. The following forms of discrimination are prohibited under this Diversity Policy:</p> <p>6.2.1. Direct discrimination: treating someone less favourably because of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation ("Protected Characteristics").</p> <p>6.2.2. Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others unless it is justified. Such a requirement would be discriminatory unless it can be justified.</p> <p>6.2.3. Harassment: sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.</p>

	<p>6.2.4. Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.</p> <p>6.2.5. Disability discrimination: direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.</p> <p>7. Recruitment and selection</p> <p>7.1. Recruitment, promotion and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, Hepsiburada aims to take steps to improve the diversity of our workforce and provide equality of opportunity. The Company's recruitment procedures will be reviewed regularly to ensure that individuals are objectively assessed on the basis of their relevant merits and abilities.</p> <p>7.2. Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.</p> <p>7.3. Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.</p> <p>7.4. Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.</p> <p>8. Disabilities</p> <p>8.1. If you are disabled or become disabled, we encourage you to tell us about your condition so that the Company can consider what reasonable adjustments or support may be appropriate.</p> <p>9. Part-time and fixed-term work</p> <p>9.1. Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.</p>
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Policy Compliance	<p>10. All policies, procedures, and regulations have been prepared within the scope of and in accordance with the Company’s Code of Conduct.</p> <p>11. Compliance with this Diversity Policy is a permanent and unchangeable part of the overall compliance report.</p> <p>12. Any questions concerning this Diversity Policy should be directed to the Ethic and Compliance Officer. If an incident of non-compliance occurs, the employee discovering the issue should immediately report the event in accordance with the Notification, Approval section of this Policy. In addition, any questions concerning the legitimacy of a transaction or potential violations should be referred to the Ethic and Compliance Officer.</p>
Education	<p>13. A copy of the Diversity Policy has been made available to all employees and it is ensured that all employees have access to the Diversity Policy at all times. Within the scope of the general training plan to which the Company is subject, in addition to the orientation training during the recruitment process, diversity trainings to be determined within the scope of the training title in the directorial manual are mandatory for all employees and managers.</p>
Notification Approval	<p>14. All internal and external Stakeholders are required to report any suspicious behavior when they encounter a suspicious situation, even if their managers or seniors are involved.</p> <p>15. The employee should first report the situation to his/her senior manager.</p> <p>16. If the situation is related to the senior manager themselves or if the senior manager has not reverted back to the situation within 7 business days, the situation should be reported to the Ethics and Compliance Officer and/or the Head of the Internal Audit Department. The Ethics and Compliance Officer and the Head of the Internal Audit Department shall coordinate in these situations.</p> <p>17. If there is a concern that the report will not be kept confidential, or for any other reason, employees or other stakeholders may report through the Notification and Whistleblowing Hotline.</p> <p>18. Notification and Whistleblowing Hotline: dol@etikhat.com, +90 212 800 34 05.</p> <p>19. All Stakeholders must cooperate in the investigation of any ethics issue.</p> <p>20. Employees who provide misleading answers during the investigation may be deemed to be complicit in the violation if detected and should be disciplined accordingly.</p> <p>21. Reports made in good faith and anyone cooperating in an investigation are protected by Notification, Consultation and Whistleblowing Policy of the Company.</p>

Penalty Sanctions	<p>22. The Company’s internal and external Stakeholders will be subject to disciplinary processes if they fail to comply with the principles and standards envisaged in the Diversity Policy.</p> <p>23. Non-compliance with the Diversity Policy may result in sanctions pursuant to disciplinary regulations such as warnings, termination of employment or commercial contract, suspension, or termination of existing projects.</p> <p>24. A termination of employment is not an obstacle and/or a prerequisite for the Company to exercise its legal rights against the infringing party before the judiciary.</p>
Performance Measurement Reporting	<p>25. At the end of each year, performance shall be measured through internal controls, notifications, training outputs or interviews with departments and report out shall be given by the Ethics and Compliance Officer to the Corporate Governance Committee, at least once per year on the Notifications received throughout the year.</p> <p>26. A risk plan may be prepared and revised according to the report indicators.</p> <p>27. Acting with the principles of continuous improvement and sustainability, business processes shall be managed in accordance with Ethics and Compliance requirements.</p>
Coordination Management	<p>28. Coordination of this Diversity Policy and its revision if needed with the internal departments is the responsibility of the Ethics and Compliance Officer of the Company in accordance with the guidance provided by the Corporate Governance Committee of the Board.</p> <p>29. Management of the Company and all employees are responsible for managing the business processes that are related to their administrative and commercial functions in accordance with this Diversity Policy.</p>
Effective Date Condition of Effectiveness	<p>30. No article of the Diversity Policy may contradict the relevant laws to which the Company is subject, nor may it include statements intended to minimize the Company’s legal responsibility.</p> <p>31. Effective date: 28.03.2024</p> <p>32. Last revision date:</p>
Updates Changes Approvals	<p>33. The Corporate Governance Committee may review the Diversity Policy and may make recommendations for amendments on certain occasions and when it deems necessary.</p> <p>34. Amendments should be carried out under the coordination of the Ethics and Compliance Officer.</p> <p>35. Amendments and revisions should be recorded with Annex-1 and Annex-2 forms and submitted to the Ethics and Compliance Officer for publishing at the Company intranet and to the Corporate Governance Committee for approval.</p>

Linked Documents	The documents listed below are documents linked to this Diversity Policy: <ul style="list-style-type: none">- Code of Conduct- Ethic Code- Notification, Consultation, and Whistleblowing Policy- Human Rights Policy
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Annex-1 Revision and Review Form

Date	Revision No	Detail	Approval

Annex-2 Amendment Proposal Form

Recommendation	
Rationale	
Proposed by	