

Policy No	Policy Name: International Sanctions Compliance Policy
Objective and Definitions	<ol style="list-style-type: none"> 1. This international economic sanctions compliance policy’s (“International Sanctions Policy”) objective is to clarify and set forth the internal rules and procedures of D-Market Elektronik Hizmetler ve Ticaret A.Ş. (“Hepsiburada” or the “Company”) concerning sanctions compliance. 2. The Company will comply with those economic sanctions that are listed in section 3 below and apply to the Company. The Company will use its best efforts to maintain effective measures to ensure risk-based compliance with, and internal awareness of, its sanctions-related obligations. 3. Sanctions. Sanctions may be imposed by countries as well as international organizations (e.g., the United Nations or the European Union) and are used to further various national security and foreign policy objectives. The sanctions regimes may impose embargoes against countries or governments or target persons or entities. Generally, sanctions prohibit nearly all direct or indirect transactions, dealings, exports and imports involving a prohibited country or prohibited person, unless the activity has been authorized or licensed by the relevant government authority which had initially or licensed or acted such sanction. For the avoidance of doubt, national laws, anti-money laundering regulations and export compliance do not fall within the scope of this International Sanctions Policy. 4. This policy covers sanctions administered or enforced by: <ol style="list-style-type: none"> a) the U.S. government (including, without limitation, the Office of Foreign Assets Control of the U.S. Department of the Treasury (“OFAC”) (https://ofac.treasury.gov/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists)); b) the U.S. Department of State (including, without limitation, the designation as a “specially designated national” or “blocked person” or U.S. secondary sanctions); c) the United Nations Security Council (“UNSC”) (https://www.un.org/securitycouncil/content/un-sc-consolidated-list); d) the European Union (https://www.sanctionsmap.eu/#/main); and e) His Majesty’s Treasury (“HMT”) of the United Kingdom (https://www.gov.uk/government/publications/the-uk-sanctions-list); (collectively, “Sanctions”). 5. Sanctions administered or enforced by the U.S. government typically apply to activities within a U.S. jurisdiction and/or activities that involve U.S. persons (or entities owned or controlled by U.S. persons) or another U.S. nexus (e.g., wire transfers in U.S. dollars that transit through the U.S. financial

	<p>system). However, secondary sanctions – which would result in a person or entity being designated as a “blocked person” or being subject to other forms of sanctions – may also be imposed against non-U.S. persons, if such persons engage in activities that are contrary to U.S. national security and foreign policies objectives and are sanctionable pursuant to U.S. law, regulations or executive orders.</p> <p>6. Sanctioned Country. A sanctioned country is a country or territory that is the subject or target of comprehensive Sanctions, including currently, without limitation, Crimea, Cuba, Iran, North Korea, the Government of Venezuela, Syria, the so-called Luhansk People’s Republic, the so-called Donetsk People’s Republic, and the Kherson and Zaporizhzhia regions of Ukraine (both of which are under EU Sanctions but not U.S. Sanctions) (each, a “Sanctioned Country”). For a list of OFAC’s sanctions programs and country information, please visit https://ofac.treasury.gov/sanctions-programs-and-country-information.</p>
Scope Responsibility	<p>7. This International Sanctions Policy applies to all areas of the Company’s business.</p> <p>8. All employees, directors, management, and officers of the Company and agents, affiliates, representatives acting on behalf of the Company shall act in accordance with this International Sanctions Policy.</p> <p>9. All business processes and related procedures of the Company are prepared, implemented in accordance with this International Sanctions Policy.</p> <p>10. All internal and external stakeholders should bear in mind that the Company may be held legally liable and/or face reputational risk if they violate applicable Sanctions (defined in section 3 above).</p> <p>11. The management are responsible for ensuring that the principles and fundamentals of the International Sanctions Policy become the way of doing business of the units they direct and that the necessary steps are taken immediately and decisively in case of non-compliance.</p>
Policy Terms	<p>12. The basic principle set out in this International Sanctions Policy is that the Company will act in accordance with all economic Sanctions laws, regulations, embargoes, or restrictive measures to which it may be subject.</p> <p>13. Our management commits to complying with applicable Sanctions by requiring that every officer, management, director, agent, and employee of the HepsiGlobal segment of the Company involved in international cross-border business</p>

	<p>transactions understands the basic elements of such Sanctions laws and complies with them at all times.</p> <p>14. The Company will make its best efforts that directors, officers or employees, nor, to the knowledge of the Company, any agent, affiliate, representative or other person associated with or acting on behalf of the Company or any of its subsidiaries is:</p> <p>14.1. owned or controlled by one or more individuals or entities that are the subject or target of any Sanctions; or</p> <p>14.2. located, organized or resident in a Sanctioned Country.</p> <p>15. The Company will act in accordance with all applicable Sanctions, and in particular will not engage in any dealings or transactions with any individual or entity that at the time of the dealing or transaction:</p> <p>15.1. is the subject or target of any Sanctions;</p> <p>15.2. is owned or controlled by one or more individuals or entities that are the subject or target of any Sanctions; or</p> <p>15.3. is located, organized or resident in a Sanctioned Country.</p> <p>16. Before engaging in any potential dealings or transactions involving Sanctioned Countries or one or more individuals or entities who are nationals of or located, organized or resident in a Sanctioned Country, the Ethics and Compliance Officer [or General Counsel or delegated to outside counsel] should carry out a Sanctions assessment for the dealing or envisaged transaction. The dealing or transaction can only take place if the officers of the Corporate Governance Department confirms in writing that the prospective dealing or transaction does not violate any Sanctions applicable to the Company. The applicable business unit of the Company which has proposed a certain transaction or dealing is also responsible for keeping the Corporate Governance Department Officer apprised of any updates or developments concerning the dealing or transaction that could impact the Sanctions assessment.</p> <p>17. When deciding whether to enter into business relationships with third parties, the Company will take into consideration such third parties' own compliance, and history of compliance, with Sanctions.</p> <p>17.1. The Company will not establish any business relationships with persons that pose a high Sanctions risk. In order to determine this, the Corporate Governance Officer will carry out the necessary investigations and examinations in coordination with other units of the Company.</p> <p>17.2. The Code of Conduct as well as all policies and procedures of the Company should be taken into consideration when determining the parties with whom a business relationship will be established, and it should be ensured that these parties act in accordance with the whole</p>
--	--

	<p>set of rules. In cases where the party with whom a business relationship will be established does not have a policy equivalent to the protection provided by this International Sanctions Policy, the relevant party should provide contractual safeguards which may include (i) a representation that the relevant party is not the subject or target of any Sanctions, (ii) an undertaking to comply with all Sanctions applicable to the Company and rules under this International Sanctions Policy or (iii) permitting the Company to terminate the contract in case the relevant party becomes the subject or target of any Sanctions or violates any applicable Sanctions or rules under this International Sanctions Policy or performance under the contract by either party becomes prohibited by Sanctions or sanctionable under secondary sanctions.</p> <p>17.3. Corporate Governance Officer will inform during its ordinary sessions the Corporate Governance Committee with respect to a summary of the matters that were assessed and Sanctions compliance approvals given if any in such period of the year. For high-risk dealings, the Corporate Governance Officer will inform the Corporate Governance Committee and Risk Committee.</p> <p>18. Considering that the scope of Sanctions and Sanctioned Countries is subject to constant change and in order to identify potential risks in terms of Sanctions, the Company will use its best efforts to periodically assess its existing business relationships to determine whether it holds any business relationships with persons that pose a high risk. Such high risks could be posed by new applicable Sanctions, the nature or location of persons with whom the Company has a business relationship as well as the elements highlighted in the OFAC Risk Matrix (Annex to 31 CFR Appendix A to Part 501 – Economic Sanctions Enforcement Guidelines). Cross-border, newly engaged business relationships of HepsiGlobal and/or the CEO office with high risk [persons or entities] should be immediately reported to the Corporate Governance Officer who, in coordination with the and relevant units of the Company such as CEO office, Risk Committee, Corporate Governance, Ethics and Compliance or Legal Department if necessary will advise the Company to take necessary actions to address the existing risks, including the termination of business relationships.</p> <p>19. Violations of Sanctions may result in the imposition of significant civil penalties, criminal fines and imprisonment of individuals, suspension of export privileges, and harm to the Company’s reputation as a NASDAQ-listed company.</p>
Exceptions	<p>20. This International Sanctions Policy is not open to exceptions.</p> <p>21. In the event of an unforeseeable situation where full compliance is not possible, the Corporate Governance Officer should be</p>

	<p>informed, a risk assessment report on the situation should be prepared and measures should be taken under the management of the Corporate Governance Committee to prevent the same situation from occurring in the future.</p>
Policy Compliance	<p>22. All policies, procedures, and regulations have been prepared within the scope of and in accordance with the Company's Code of Conduct.</p> <p>23. Compliance with this International Sanctions Policy is a permanent and unchangeable part of the overall compliance report.</p> <p>24. The Company will use its best efforts to ensure compliance with this International Sanctions Policy, which is regularly measured and monitored through compliance assessments and sanction tools.</p> <p>25. The person(s) responsible for administering the Company's internal controls and procedures and assuming authority and responsibility for day-to-day compliance issues hold(s) the position of the Ethics and Compliance Officer and will be provided with necessary information, tools, supports, technical support. The person(s) responsible for administering the Company's internal assessment and approval of transactions and dealings from International Sanctions Policy perspective holds the position of the Corporate Governance will be provided the necessary encouragement, technical and headcount support, sanction database subscription and software tools and funding from the Company's management to maintain compliance with changing Sanctions, Sanctioned Country and other related requirements.</p> <p>26. Any questions concerning this International Sanctions Policy or any Sanctions, rules, or regulation should be directed to the Corporate Governance 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 Corporate Governance Officer.</p>
Education	<p>27. A copy of the International Sanctions Policy has been made available to all employees and it is ensured that all employees have access to the International Sanctions 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, sanctions trainings to be determined within the scope of the training title in the directorial manual are mandatory for all employees and managers.</p> <p>28. Basic Sanctions training will be provided on an annual basis to relevant directors, officers, managers and other employees (as</p>

	deemed relevant) on a periodic basis (at least annually) and may take different forms, such as distribution of information notes via email.
Notification Approval	<p>29. 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>30. The employee should first report the situation to his/her senior manager.</p> <p>31. 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>32. 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.</p> <p>33. Notification and Whistleblowing Hotline: dol@etikhat.com, +90 212 800 34 05.</p> <p>34. All stakeholders must cooperate in the investigation of any ethics issue.</p> <p>35. 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>36. Reports made in good faith and anyone cooperating in an investigation is protected by Notification, Consultation and Whistleblowing Policy of the Company.</p>
Penalty Sanctions	<p>37. 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 International Sanctions Policy.</p> <p>38. Non-compliance with the International Sanctions Policy may result in sanctions pursuant to disciplinary regulations such as termination of employment or commercial contract, suspension, or termination of existing projects.</p> <p>39. This termination 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	40. At the end of each year, performance shall be measured through internal controls, notifications, training outputs, and interviews with departments and an annual report shall be prepared by the

	<p>Ethics and Compliance Officer on the Notifications received throughout the year.</p> <p>41. A new risk plan should be prepared according to the report indicators.</p> <p>42. 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>43. Coordination of this International Sanctions Policy is the responsibility of the Ethics and Compliance Officer of the Company.</p> <p>44. Management of the Company and all HepsiGlobal employees are responsible for managing the business processes that are related to their administrative and commercial functions in accordance with this International Sanctions Policy.</p>
Effective Date Condition of Effectiveness	<p>45. No article of the International Sanctions 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>46. Effective date: 16.11.2023</p> <p>47. Last revision date:</p>
Updates Changes Approvals	<p>48. The Corporate Governance Committee may review the International Sanctions Policy and may make recommendations for amendments on certain occasions and when it deems necessary.</p> <p>49. Amendments should be carried out under the coordination of the Corporate Governance Officer.</p> <p>50. 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 web-site and to the Corporate Governance Committee for approval.</p>
Linked Documents	<p>The documents listed below are documents linked to this International Sanctions Policy:</p> <ul style="list-style-type: none"> - Code of Conduct - Anti-Corruption and Anti-Bribery Policy - Notification, Consultation, and Whistleblowing Policy - Third-Party Risk Management Guide - Personnel Regulation - Purchase Procedure

Annex-1 Revision and Review Form

Date	Revision No	Detail	Approval

Annex-2 Amendment Proposal Form

Recommendation	
Rationale	
Proposed by	