

ESAS ASSET MANAGEMENT

EMERGENCY AND CONTINGENCY PLAN

Board of Directors' Approval

Date: 16.12.2024

No: 7

1. PURPOSE

The purpose of this plan is to outline the conditions, methods, and procedures for Esas Asset Management (the "Company") to fulfill its obligations towards clients, brokerage firms, market participants, shareholders, and third parties in the event of emergencies and unexpected situations. It also establishes relevant workflow plans.

This plan has been prepared in accordance with the provisions of the Capital Markets Board's Communiqué No. III-55.1 on "Portfolio Management Companies and Principles Regarding Their Activities".

2. DEFINITIONS

Company	:	Esas Asset Management
Board	:	Capital Markets Board
E.U.S.	:	Emergency and Unexpected Situations
E.U.S.P.	:	Emergency and Unexpected Situations Plan
E.U.S.C.	:	Emergency and Unexpected Situations Committee
A.O.C.	:	Alternate Operation Center
TCC	:	Turkish Commercial Code (Law No. 6102)
Client	:	Individual or institutional party receiving portfolio management services
IT Systems	:	Systems that enable the Company to carry out its operations normally, ensure the transmission and execution of orders from its clients, manage clearing and custody transactions, and maintain and monitor the accounts of the clients it serves.

3. SCOPE

Situations that endanger or are likely to endanger the continuity of the Company's activities, the safety of life and property of the employees, and that will be announced after the decision and instruction to be given by the Company officials are described as "Emergency and Unexpected" situations.

In case of unexpected negative events in the company's business processes;

- To ensure continuity in our customer service,

- To fulfill our legal responsibilities and to third parties in a timely manner,
- To reduce the effects of extraordinary situations on our financial situation by not causing complexity / interruption in our workflows,
- To minimize the loss of life and property of our employees and customers in case of emergency,
- To protect our assets in the best way in unexpected situations

It is aimed to have a risk-based, functional business continuity plan focused on critical business processes.

The Plan covers the processes regarding the actions to be taken by the Company's personnel in the event of the interruption of the Company's activities or the services provided by the outsourced organizations due to emergency and unexpected situations. In this context, the main **emergencies and unexpected situations** are listed below, including but not limited to:

- Earthquakes, fires, floods, storms and similar natural disasters,
- War, terrorist attacks, popular uprising, and the like,
- Unexpected situations such as fire, flood, explosion, etc., which may occur in the location of the Company or the organizations providing outsourced services to the Company and/or in the building in which they operate,
- Cessation of transactions in money and capital markets due to unexpected situations that may occur in financial markets, collection and payment systems do not work,
- Failure to come to work due to illness, epidemic, traffic accident, work stoppage, and the personnel of the Company's personnel or the personnel of the organizations that provide external services to the Company,
- The inoperability of the information processing and communication systems of the Company or the organizations that provide external services to the Company, unauthorized and damaging electronic attacks, entries and viruses.

As a result, the Company may be exposed to the following dangers:

- Loss of access to communication and telecommunication facilities and/or temporary unusability of these systems,
- The information processing system becomes temporarily unusable,
- Loss of access to the infrastructure and/or temporary unusability of the infrastructure,
- Loss of trained human resources and/or temporary inability to provide services within the Company,
- Assets used for the continuation of the company's activities are damaged and/or temporarily unusable,
- Interruption of activities carried out through outsourcing and/or inability of external institutions to provide services.

4. PERSONS RESPONSIBLE FOR THE IMPLEMENTATION OF THE PLAN

The plan is approved by the Board of Directors of the Company. The persons responsible for the implementation of the Plan and the E.C.C. (Emergency and Contingency Committee) shall be determined by the decision of the Board of Directors of the Company, which shall include at least one Company personnel at least at the level of deputy general manager and another Company personnel to be determined as an alternative to this person, and the title and all kinds of contact information of these persons shall be determined by the Board, Central Registry Agency Inc., Borsa Istanbul A.Ş., It is notified to Istanbul Clearing and Custody Bank A.Ş. and other institutions determined by the Board.

This plan has been distributed electronically to all personnel of the company, and it has been ensured that the personnel are informed about the plan and the responsibility undertaken within this plan. The contact information required for the communication of the personnel with each other has been added to the Company's common file as a list.

Due to the emergency and unexpected situation, the failure to ensure the continuity of the information processing systems and/or the need for at least 2 days to repair the damage, and in case the working environment is not physically suitable, it is the primary duty of the persons responsible for the implementation of the Plan to determine the situation and what measures should be taken.

The persons responsible for the implementation of the Plan shall review the adequacy of the workflow procedures established in the Plan annually, taking into account the activities of the Company, if any, changes in the organizational structure such as opening or closing branches and personnel changes, and if necessary, necessary changes are made in the procedures related to the E.C.C.

5. APPLICATION AND WORKFLOW

a. Keeping Financial Statements and All Kinds of Records and Negotiable Instruments Required to Be Kept in Accordance with the Current Legislation in Printed and/or Electronic Environment in Accordance with Article 82 of the TCC

The financial statements of the Company and all kinds of records and documents that are obliged to be kept in accordance with the legislation **are stored in printed form in the safe in the Company and in the fireproof steel protection cabinets in the archive room.** In addition, all records are protected by taking backups electronically. If the records are damaged or inaccessible, it is possible to reproduce them through the system.

b. Ensuring the Continuity of Information Processing Systems for the Uninterrupted Continuation of the Company's Activities, Taking Backups and Keeping the Backups of the Electronic Records for Five Years

In order to ensure the continuity of the information processing systems in order to maintain the activities of the Company uninterruptedly in case of emergencies and unexpected

situations, the accounting data of the Company and the funds managed by the Company are systematically backed up, and copies created as backups are kept in different locations for at least five years. In addition, cloud storage systems offered by corporate companies are also used, and both server data and critical files on user computers are backed up by instant synchronization over the cloud. In addition, in terms of location difference, 2. Reserves are kept in Ankara.

The company's internet access is **provided via** the Ttnet internet line. **Vodafone** is available as a backup line.

Company personnel use desktop and portable notebook computers, and it is possible to continue working via battery or UPS in case of short-term interruptions in the power network. In case of long-term interruptions, the generator is activated if necessary and all personnel are able to continue their work from any point.

c. Operational Risk Assessment, Including Financial and IT Infrastructure

As a result of the explanations made in (b) above, the risks that may arise from problems that may occur in information processing systems have been minimized.

In financial terms, the financial assets of the Company, customers and funds are kept with the custodian. There is no cash in the safe that exceeds daily necessities. In this respect, it has been ensured that financial risks are minimized.

Backups have been made among the Company's personnel against situations such as illness and work stoppage.

d. Providing and Ensuring the Continuity of Alternative Communication Channels with the Served Persons

In case of emergencies and contingencies, after determining the operability of the existing communication channels, the service providers will be contacted by telephone and e-mail through the open communication channels. If these channels are closed, communication will be established from mobile phones.

e. Ensuring the Supply and Continuity of Alternative Communication Channels with the Company and Its Personnel

The contact information and residence addresses of the company personnel are kept up-to-date. In the face of emergency and unexpected situations, the personnel are contacted using alternative communication channels. Open mobile phone devices and e-mail are used as communication channels.

f. Alternative Corporate Headquarters

Alternative in case the company's headquarters becomes unusable as a result of emergency and unexpected situations As the headquarters of the company; **Osmanlı Bulvarı No:11/A 34912 - Kurtköy/Istanbul, Turkey Left entrance 1. Park** address has been determined. Also 2. As an alternate address: **41 Burda - Sanayi, Ömer Türkçakal Bly. No:7, 41040 İzmit/Kocaeli 41 Burda Office floor** has been determined. Since the company does not make any production, it does not need a specific business area.

g. Assessment of the Possible Effects of the Emergency and Unexpected Situation on the Other Party

All assets belonging to the funds and customers served are kept by the custodial institution. There is no loss in the face of emergency and unexpected situations.

h. Informing the Board about the measures taken, how to make routine mandatory notifications

The persons responsible for the implementation of the Plan shall immediately notify the Board of the emergency and contingency and the measures taken against it. In the absence of persons responsible for the implementation of the Plan, the instructions of the Company's highest current senior manager will be followed. Routine mandatory notifications will be made in writing or verbally in writing using the most appropriate method after the current situation assessment. Notifications will be made through the use of backups of the Company's records.

i. Access to Customers' Accounts and Transfer of Said Accounts to Another Company in Case the Company Decides That the Activity Cannot Continue

In the event that the Board of Directors of the Company decides that the Company cannot continue its activities due to an emergency and unexpected situation, the customers, shareholders and the institution that carries out the custodial service of the funds it is the founder of will be informed of this situation and the transfer of the assets of the said funds will be carried out to the relevant institutions with the approval of the customer.

In the event that the Company manages funds established by other portfolio management companies, the portfolio management company that is the founder of these funds will be notified of the situation and the cancellation of the management agreements and the transfer of management powers of the said funds will be carried out with the approval of the portfolio management companies.

j. Outsourced Services

The service outsourced by the company is carried out within the scope of the contract signed by determining whether the service provider organization has the technical equipment, infrastructure, financial power, experience, knowledge, human resources and emergency action plan and facilities to perform the service to be provided at the desired quality.

In case of interruption or disruption of the outsourced service, the service provider is asked to make a detailed explanation about the duration of the interruption and to take action according to its own emergency plan, and the relevant procedures are followed through the emergency and contingency officer.

6. EFFECTIVE

The plan enters into force as of the date it is approved by the Board of Directors of the Company, is reviewed at least once a year by the emergency and contingency officer, and is updated by the decision of the Board of Directors as a result of the changes in the legal regulations and the structure of the Company. A copy of this plan is given to the counterparty during the signing of portfolio management contracts. This plan is also published on the Company's website and notified to the relevant Institutions.

E.C. Action Plan:

In the face of Emergency and Contingency, what needs to be done according to business priorities is determined as follows.

It's Time to Take Action	Action	Responsible
First 3 hours	E.U.S.C. convenes.	President of E.U.S.C.
	E.U.S.C. members determine the status of the units and unit personnel within the Company and contact the personnel.	E.U.S.C. members
	E.U.S.C. is notified to all relevant units within the Principal Portfolio.	E.U.S.C. members
First 6 hours	The working environment of the A.O.C. is implemented. Damage assessment begins.	President of E.U.S.C. and Chief Information Officer
first 24 hours	It is announced publicly on the official website of E.U.S.C.	President of E.U.S.C. and Chief Information Officer
	E.U.S.C. and the measures taken are notified to the institutions through the most appropriate communication with the CMB.	President of E.U.S.C.
	E.U.S.C. and the measures taken are communicated to all customers through the most appropriate communication.	E.U.S.C. President and Customer Representatives/Marketing Staff
After the first 24 hours	Necessary attempts are initiated to switch to routine operation.	President of E.U.S.C. and Chief Information Officer
	Developments and the situation are regularly reported to both the Company's management and all relevant institutions, especially the CMB.	President of E.U.S.C.

The priority of the processes in the face of Emergency and Contingency has been determined as follows:

Processes	Priority Over the U.S.
Activities related to Fund and Portfolio Management	First Degree
Operational activities	First Degree
Information Technology activities	First Degree
Risk Management activities	First Degree
Activities of Financial and Administrative Affairs	Second Degree
Research activities	Second Degree
Investment Consultancy, Sales and Marketing activities	Second Degree
Inspection activities	Second Degree
Internal Control activities	Second Degree