locur	Name	BORSA İSTANBUL A.Ş. BUSINESS CONTINUITY POLICY		
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	Prepared by	PROJECT MANAGEMENT AND PLANNING DIRECTORATE		
	Approved by	BOARD OF DIRECTORS		



BUSINESS CONTINUITY POLICY

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1. Revision Records

1.1 Revision History

Rev	Date of Revision	Revision Articles	Revision Description
No			
-	24/12/2018	-	First approved version
1	10/12/2020	-	Update
2	10/05/2023	-	Update
3	28/02/2024	Entire document	Ownership of the document has been updated.
			The document has been reviewed within the
			scope of annual inspections.
4	14/04/2025	Entire document	Annual inspection has been done within the scope
			of ISO

1.2 Comparison Table

The comparison table is given in Appendix-1 attached hereto.

2. Purpose, Scope and Grounds

2.1 Purpose and Scope

The corporate business continuity strategy of Borsa İstanbul A.Ş. is comprised of assessing the risks and opportunities on the basis of business continuity and resilience, and ensuring that the transactions are operated safely and uninterruptedly. Within this framework, the basic purpose of the Business Continuity Policy (the "Policy") is to define the policies and principles adopted by senior management for the sake of establishment and management of a Business Continuity Management System (BCMS) executed efficiently in integration with business processes and compatibly with the mission, vision and corporate strategy of Borsa İstanbul A.Ş.

The Business Continuity Policy encompasses all premises within the Exchange, and all products and services offered in these premises, and all processes supporting those products and services, as well as the Information Technologies (IT) components, the Exchange employees, subsidiaries, members, data vendors (DV), suppliers and all other stakeholders.

2.2 Grounds

This Policy is prepared and issued in reliance upon the Information Systems Management Communiqué, no. VII-128.9, dated 05/01/2018, of the Capital Markets Board, and ISO 22301 Business Continuity Management System standards.

3. Definitions and Abbreviations

BORSA İSTANBUL A.Ş. BUSINESS CONTINUITY POLICY

For the purposes and in the context of this Policy:

- "Exchange" stands for Borsa İstanbul A.Ş.; and
- "IT" stands for Information Technologies; and
- "IT Components" refers to the systems, applications, infrastructures, software and hardware; and
- "BCMC" stands for Business Continuity Management Committee; and
- "BCMS" stands for Business Continuity Management System; i.e. systematic management of the activities required to be carried out for continuously maintaining the business processes of the Exchange; and
- "Business Continuity" refers to the ability to continue offering the products and services at a predetermined capacity and within acceptable time slices during an interruption; and
- "DROC" stands for Disaster Recovery Operation Center; and
- "DRDC" stands for Disaster Recovery Data Center; and
- "Policy" stands for this Business Continuity Policy; and
- "Senior Management" stands for Borsa İstanbul A.Ş. Chief Executive Officer, Executive Vice Presidents and Chief Audit Executive; and
- "Member" refers to members, authorized by the Board of Directors for trading in the Exchange, among those referred in first paragraph of article 24 of the Regulation on Principles of Foundation, Activities, Working and Audit of Exchanges and Market Operators promulgated in the Official Gazette numbered 28712 and dated 19/07/2013; and
- "DV" stands for Data Vendors; and
- "Board of Directors" stands for Borsa İstanbul A.Ş. Board of Directors.

4. BCMC Organization, Roles and Responsibilities

BCMC assigned by the Exchange Board of Directors leads the activities of determination of policies and standards on business continuity throughout the Exchange, and formation of the required processes and control mechanisms, and continuous improvement of BCMS.

Under this Policy, the related units of the Exchange are responsible for management of processes under their responsibility within the frame of business continuity management system established within the Exchange organisation, and implementation of this policy throughout the Exchange, and information of the related parties thereabout.

This Policy is reviewed by BCMC regularly at least once a year, and in the case of changes in the legislative instruments and/or in other internal or external issues affecting the business continuity, without waiting for periodic update, and becomes effective upon an approval of the Board of Directors.

Procedures and principles relating to implementation of this Policy are regulated by the legislative instruments.

5. Business Continuity Policy Statement

Business continuity management system aims:

- First of all, to protect human life and ensure safety; and
- To make sure that the Exchange's services are continued with as less interruptions as possible for achievement of strategic goals of the Exchange; and
- To ensure that critical business processes and IT components determined by a business impact analysis are made functional again within the targeted recovery time; and
- To minimize the time required for taking critical decisions in emergencies; and
- To manage the risks having negative effects on business continuity; and
- To manage the internal and external communication and media relations in emergencies.

With a view to directing the business continuity management system, the Exchange adopts it as its first priority to ensure the security of life in crises and emergencies threatening the human life, and to assure full compliance with the related legislative instruments and the requirements of expectations of all stakeholders, especially the investors.

While assuring the continuity of its activities through BCMS built in compliance with its mission, vision, corporate strategy and ISO 22301 standards, the Exchange relies upon the following policies:

- a. In the course of outlining the scope of BCMS, the Exchange determines the internal and external factors affecting its ability to assure business continuity, as well as the related parties, also including regulatory and supervisory bodies, and their requirements.
- b. In tandem with the risk appetite determined by the Board of Directors, business continuity goals are identified, and both the employee competences, and other resources, especially upto-date, reliable and redundant technologic infrastructure, required for achievement of said goals, are allocated.
- c. The required analyses are conducted by taking into consideration that business interruption tolerance is very low in the served markets, and risks are detected early and proactive measures are taken for prevention of any probable interruptions in critical business processes and services.

- d. Plans are prepared, tested and kept up-to-date through continuous improvements in order to be ready for a probable crisis or emergency and to minimize the probable service interruption time.
- e. Operational infrastructures and organizational structures are created and built-in alternative premises to be used in the case of a crisis or emergency.
- f. Probable financial loss that may be incurred by the Exchange or its stakeholders in the case of a crises or emergency is minimized.
- g. Under any circumstances, interests of stakeholders and reputation of the Exchange are protected, and actions are taken for minimization of probable losses.
- h. All of the activities, especially trainings and drills, needed in order to instill the business continuity consciousness in the corporate culture and to raise the awareness of employees are carried out.
- Based on the fact that business continuity is the assurance of continuity of markets, the
 requirements relating to business continuity are taken into account at the stages of design,
 planning, implementation and review of all processes and services within the organization of
 the Exchange.
- j. BCMS is regularly reviewed, and is ensured to be improved continuously through audit.

6. Miscellaneous and Final Provisions

6.1 Effective Date

This Policy becomes effective as of the date it is approved by the Board of Directors.

6.2 Execution

The provisions of this Policy are enforced and executed by the Chief Executive Officer.

Appendices

Appendix-1: Comparison Table

Previous Version	Current Version	
CODE: 24.POL.02	17.POL.02	
PREPARED BY: RISK MANAGEMENT AND	PREPARED BY: PROJECT MANAGEMENT AND	
INTERNAL CONTROL DIRECTORATE	PLANNING DIRECTORATE	