



TAX POLICY

1. Introduction

Founded in 1991, Mavi Giyim Sanayi ve Ticaret A.Ş. (“Mavi” or the “Company”) is a global lifestyle brand operating in 34 countries, driven by its denim expertise and design strength. Since its public offering in 2017, the Company meets its customers through retail, wholesale, and online channels across international markets, including Türkiye, the USA, Canada, Germany, and Russia. Its position in the jeans segment, international brand recognition, and extensive geographic footprint make the Company’s tax processes strategically significant.

2. Purpose of the Policy

This Tax Policy (the “Policy”) has been prepared to define Mavi’s approach to taxation, compliance principles, and ethical stance within a corporate framework across all regions of operation. The Policy aims to increase transparency in the Company’s tax processes, ensure consistency in practices, and develop a tax management approach aligned with international standards. Furthermore, this Policy intends to strengthen Mavi’s sense of responsibility toward public authorities, shareholders, investors, employees, all other stakeholders, and society at large.

The Company’s tax practices are built upon the principles of accountability, transparency, and responsibility. Mavi regards taxation as a fundamental contribution to the financing of public expenditures and a responsibility that serves the development of the communities in which it operates. With this understanding, the Company considers the public interest in its decision-making processes and maintains an approach to tax management that is responsible, based on legal compliance, and rooted in cooperation with competent authorities.

Mavi views tax not merely as a legal obligation but also as a key element of its sustainability approach. While aiming to provide a fair and balanced tax contribution in all countries where it operates, the Company commits to conducting its tax practices in alignment with environmental, social, and governance (ESG) principles. This approach is an integral part of the Company’s long-term value creation strategy.

3. Scope

This policy covers Mavi Giyim Sanayi ve Ticaret A.Ş. and its subsidiaries and affiliates. Direct and indirect taxes, withholdings, transfer pricing obligations, international reporting requirements, and incentive applications in all countries of operation fall within the scope of this policy.

4. Tax Governance and Responsibilities

At Mavi, tax processes are carried out within the framework of a strong governance structure. This policy is prepared by the Accounting and Tax unit under the Mavi Global Finance department and is published upon the approval of the Board of Directors. The Board of Directors oversees compliance with this policy through the CFO, who reports to the CEO and holds administrative responsibility. The Accounting and Tax unit under the Global Finance Department is responsible for executing the strategies and practices specified in the Policy.

Authorities and responsibilities in tax processes are clearly defined and regularly reviewed within the framework of Corporate Authorization Limits (CAL) and workflow documentation.

5. Core Principles of Tax Compliance

Mavi considers full and timely compliance with the tax legislation in force in every country of operation as a primary priority. Accordingly, the Company adopts the principle of acting in accordance with both the letter and the spirit of tax laws. Reasonable legal interpretation is essential in determining tax positions, supported by technical analysis and independent expert opinions where necessary. The Company acts proactively regarding compliance with legislative changes, evaluating the potential impacts of expected regulations prior to their enactment. Mavi avoids structures that lack commercial substance and are intended solely to create tax advantages.

Tax compliance comprises not only filing and payment processes but also accurate data management, system integrity, and close monitoring of legislative changes. In this context, Mavi systematically utilizes digital solutions that support data accuracy and process reliability by continuously improving its internal control processes.

Advanced digital solutions and analytical control mechanisms are used within the Company to enhance data accuracy and process reliability. These systems aim to protect data integrity, minimize the margin of error, and maximize process reliability by proactively analyzing tax risks.

Mavi prioritizes the professional development of its teams for full compliance with current legislation; accordingly, it provides corporate-level support for technical training, seminars, and certification processes attended by personnel.

Mavi bases its relationships with tax authorities and relevant stakeholders in all geographies of operation on the principle of transparent and consistent information sharing. Tax management is not merely a compliance process; it is an integral part of the Company's strategic planning and decision-making mechanisms. This holistic approach ensures the accurate forecasting of the tax impacts of global operations, safeguarding our accountability to all stakeholders and our stance focused on social benefit.

Tax processes are conducted in an integrated manner with the Company's internal control and risk management systems. In this regard, the relevant operational teams are responsible for executing processes accurately and in accordance with legislation. Internal control and risk

management functions monitor the effectiveness of processes and provide necessary controls, while the internal audit function offers independent assurance regarding these processes.

6. Approach to Tax Planning

Mavi's tax planning is based on the economic reality of the Company's activities and is carried out in alignment with the Company's long-term strategic goals.

Mavi considers benefiting from legal incentives as a legitimate right recognized within the legislative framework; however, it strictly avoids utilizing such incentives contrary to their purpose or engaging in structuring for such ends.

The Company does not engage in non-transparent structures or those lacking commercial substance for the purpose of providing tax advantages. For tax planning purposes, Mavi only evaluates structuring in locations with low-tax or preferential tax regimes if the relevant structure is based on genuine commercial activity and economic justification. It strictly avoids configurations that lack economic substance and are aimed solely at providing tax advantages. The tax impacts of international operations are managed by considering the legislation of the relevant country, international treaties, and the standards of the Organization for Economic Co-operation and Development ("OECD").

7. Approach to Transfer Pricing

Due to Mavi's international structure, transfer pricing processes hold strategic importance. The Company bases all intra-group transactions on the Arm's Length Principle and establishes its pricing in compliance with the OECD Transfer Pricing Guidelines, Türkiye's local regulations, and the national legislations of other countries. Transfer pricing analyses are based on economic data studies and, when deemed necessary, independent consultant reports.

Transactions of goods and services between the Company's domestic and international subsidiaries and affiliates are determined based on function-risk-asset analysis. This approach, based on paying tax where value is created, forms the foundation of international tax compliance.

The Company systematically compares its transactions for the purchase and sale of goods and services with related parties, both domestically and abroad, against non-group transactions in the same category.

8. International Tax Compliance Approach

Mavi's multinational structure makes compliance with international tax regulations a strategic necessity. The Company commits to complying with the BEPS (Base Erosion and Profit Shifting) Action Plan, international standards for information exchange, reporting obligations, and all relevant global practices.

Mavi prepares and submits the necessary documentation in line with OECD guidelines and BEPS action plans; in this framework, it fulfills obligations such as the Master File, Local File,

and, if applicable, Country-by-Country Reporting (CbCR) in a timely manner within the scope of the relevant legislation.

Double taxation treaties are taken as the basis for the correct taxation of cross-border transactions. In cases of potential differences in interpretation between different countries, Mavi acts with documented and reasonable legal positions.

In the local compliance processes required by global operations, Mavi aims to maintain the accuracy and reliability of monthly filing obligations in each country at the highest level. Accordingly, regular technical support is received from expert international consultancy firms to ensure full compliance with the relevant national legislations and to manage filing processes without error. This collaboration ensures that the Company fulfills its international obligations completely and demonstrates global consistency in reporting standards.

9. Tax Incentives

Mavi benefits from all legal incentives appropriate to the nature of its activities within the framework of transparency, accuracy, and full compliance with the relevant legislation. It is ensured that incentives are utilized only in areas that generate economic contribution; practices aimed at obtaining incentives through artificial means are strictly prohibited. Necessary documentation is prepared in full during incentive processes, which are conducted in cooperation with the relevant authorities.

For Mavi, the continuity of the incentives utilized is essential for maintaining financial sustainability. To safeguard this continuity, reporting processes documenting the fulfillment of incentive criteria are carried out meticulously. In addition to protecting its current gains, the Company regularly researches and evaluates potential incentive opportunities that will add value to its operations.

10. Relations with Tax Authorities

Mavi conducts its relations with tax authorities with openness, honesty, cooperation, and mutual information sharing. A clear communication style is adopted during tax audits; requested documents and information are submitted accurately, completely, and in a timely manner. In cases of uncertainty regarding the interpretation of legislation, Mavi aims to provide clarity on the application by proactively contacting the authorities. This approach forms the basis of both legal certainty and long-term sustainability.

In disputes that may arise as a result of tax audits, Mavi primarily evaluates administrative remedies and reconciliation mechanisms within the framework of the relevant legislation. However, the Company does not hesitate to seek judicial remedies when deemed necessary to protect its rights. The principles of transparency, consistency, and legal security are taken as a basis in all dispute processes.

11. Transparency, Reporting, and Documentation

Mavi prepares all tax returns and notifications accurately, completely, and on time. Systemic controls and internal audit practices are implemented to ensure the accuracy of the data used in tax processes. Especially in tax refund transactions, ERP (enterprise resource planning) systems and other digital solutions complementing these systems are utilized in an integrated manner to ensure data consistency and error-free process management. All documents and records related to taxation are stored securely for the period specified in the legislation of the relevant countries. The Company adopts transparency as a principle in reporting processes and receives technical support from independent auditors when necessary.

Mavi bases its public disclosures regarding tax on the principles of transparency and accountability. In this context, the Company aims to provide meaningful and balanced information for investors and other stakeholders within the framework of current regulations. Disclosures regarding tax practices are prepared to be consistent with the Company's financial reports and other relevant public documents.

12. Non-Compliance and Violations

Mavi bases its operations on full compliance with the principles and rules set forth in this Policy. Transactions contrary to tax legislation, false or misleading statements, off-the-record practices, and any behavior contrary to this Policy are considered a violation of Company rules.

Company employees and all relevant stakeholders may report potential violations or non-compliances regarding tax processes through existing Ethics Line notification channels. Notifications are handled in accordance with the principle of confidentiality and evaluated within the framework of relevant procedures.

Necessary disciplinary and legal processes may be initiated under the relevant legislation and internal Company regulations for employees whose behavior contrary to this Policy causes financial, legal, or reputational damage to the Company. In line with the identified violations, necessary corrective and preventive actions are taken to prevent the recurrence of similar situations, and relevant processes are conducted in integration with the Company's compliance and internal control mechanisms.

13. Review of the Policy

This Tax Policy is reviewed at regular intervals by the tax team within the Global Finance Department in line with changes in tax legislation, developments in international practices, and transformations in Mavi's operational model. Update processes are carried out by obtaining the opinions of expert consultants, the Integrated Management Office, and the Internal Control and Process Management teams. The Policy, renewed according to changing needs, enters into force upon approval by the Board of Directors.