
GLOBAL ANTI-BRIBERY and ANTI-CORRUPTION POLICY



KAZANCI HOLDING

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INTRODUCTION

In line with our organizational goals we recognize the importance of a consistent, effective and transparent communication model to achieve global success. For this reason, we have established a comprehensive Global Anti-Bribery and Anti-Corruption Policy to communicate with all our stakeholders in an open, transparent and reliable manner. In this way, we aim to provide a business environment aligns with our ethical standards by adopting a preventive approach against the bribery and corruption risks we face today.

1. PURPOSE

With this policy, we determine the principles adopted and implemented by our company in combatting harmful practices such as “bribery” and “corruption” in our activities and in our relations with national and international public institutions and the private sector.

This policy is an integral part of our company's Global Corporate Compliance Program and is in line with our company's other policies, together with domestic and international regulations for the purpose of providing an honest, transparent and ethical business environment.

The policy aims to demonstrate our commitment to protecting and improving our reputation and trust, meeting the expectations of our internal and external stakeholders, and managing our compliance risks effectively and efficiently.

2. SCOPE

This Policy covers managers and employees in all countries where our company operates, as well as suppliers and third parties who provide services on behalf of our company.

All our business partners are obliged to meet the ethical standards expected of company business partners in the services and actions we perform on behalf of our company.

The rules that suppliers providing services for our Company must comply with are defined in our “Global Supply Chain Policy”.

3. MAIN PRINCIPLES

3.1. Anti-Bribery and Anti-Corruption

Article 10 of the United Nations Global Compact emphasises that businesses should work against all forms of corruption, including extortion and bribery.

Our Company adopts the principle of conducting its activities in compliance with the national and international legal regulations on anti-bribery and anti-corruption and integrity commitments in force.

Our Company prohibits any forms of bribery and/or corruption, including payments to facilitate and/or expedite our operations, even if such payments are not defined as an act contrary to the laws of the countries in where it operates.

Our Company employees are obliged to comply and act in accordance with this policy, together with the regulations of the countries in which we operate. If the circumstances indicate a possible violation of this policy, each employee is obliged to inform the Compliance Department.

Compliance with our policy is the responsibility of all our employees, and it is essential that the senior management of our company takes the lead in compliance with the policy.

In addition to fulfilling the obligations required by law, our company also applies the provisions specified in the Disciplinary Regulation against employees who violate our policy. In the event that the violators are our Business Partners doing business on behalf of the company, our company will consider terminating all relations with the relevant parties.

3.2. Relations with Private Sector and Public Sector

Our Company conducts its relations with public and private sector organizations in the countries where it operates in accordance with this policy.

Our company employees who communicate with Public Representatives or Private Sector organization managers comply with local laws and our company's policies during the communication process.

During the communication process, our company employees shall inform compliance officers, senior managers and the Compliance Department of any bribery and facilitation payment requests they may receive in order to achieve their business objectives.

3.3. Individual and Entities Operating on Behalf of the Company (Business Partners)

All individuals and entities operating on behalf of Our Company (Business Partners) execute business activities in line with:

- Anti-bribery and anti-corruption laws in the countries in which they operate,
- This Policy and
- Global Corporate Compliance Programme Policy.

Our Company reserves the right to verify whether our Business Partners carry out their activities in accordance with the aforementioned company policies.

Our Company conducts due diligence review if it assesses that the parties operating or intending to operate on its behalf are risky. Due Diligence includes questions prepared to assess the degree of risk arising from the past activities of our Business Partners and/or related to the contract, as well as to collect information on Business Partners in order to identify possible measures. The questions subject to due diligence aim to investigate the structure of our business partners, whether there are any improper actions of our legal entities and members of Board of Directors in past activities that may be associated with bribery.

Our company employees contact the Compliance Department for due diligence review support. Based on the details of the plan shared by our employees, the Compliance Department decides on the level of due diligence information to be requested from the business partner and informs our employees to submit the relevant form to the company.

The results and opinions of the due diligence review to be carried out in line with our company's capabilities are shared with our relevant employees by the Compliance Department within a reasonable period of time. The commercial decision to be taken based on the results and opinions shared is the responsibility of our company managers.

3.4. Conflict of Interest

Conflict of interest refers to situations where an employee's personal interests, directly or indirectly, may prevent their ability to make decisions, conduct evaluations and/or perform their professional responsibilities in the best interests of the Company.

Our employees are obliged to avoid individual interests, situations that may be misunderstood and interpreted as individual interests.

Comprehensive information and explanations on conflicts of interest are available in our "Global Conflicts of Interest Policy" under the responsibility of the Compliance Department.

3.5. Gift and Hospitality

Our employees are obliged to act in the best interests of our company and should not prioritize their personal interests when making decisions in their activities related to our company. Gifts and hospitality may be used in activities aimed at establishing and developing business relationships; however, it is important that gifts and hospitality are received and/or given in accordance with certain rules.

Gifts and hospitality should not be considered as personal interest by any of our employees, and each offer or acceptance of gifts and hospitality should be evaluated and decided in detail.

Details regarding the rules, limits and approval rules for accepting and offering gifts and hospitality, are defined in our “Global Gifts and Hospitality Policy” under the responsibility of the Compliance Department.

3.6. Donations and Sponsorships

Our Company aims to support donation and sponsorship activities that strengthen social living standards in the regions where it operates.

In accordance with the rule of “transparency” in our company's activities, it defines the approvals that must be obtained before donation and sponsorship plans, and provides information about donations and sponsorship activities that should not be carried out.

Donations or sponsorship activities that may violate the laws, damage the reputation and brand value of our company, or cause conflict of interest should not be made.

The donation in which our company is involved should be based on causes that have a positive impact on society, with no expectation of improper benefits. In addition, each sponsorship must be in line with our company's brand themed plans.

Donations and sponsorship activities should not be undertaken if they are likely to be evaluated as attempts to obtain improper benefits or if they pose a risk to our companies image and reputation.

Details on donation and sponsorship rules and approval system are included in our “Global Donations and Sponsorships Policy” under the responsibility of the Compliance Department.

4. REPORTING OF NON-COMPLIANT ACTIONS IN RELATION TO THE POLICY

Reporting of actions not in compliance with this Policy should be made to the following communication channels:

- Email: etik@aksa.com.tr,
- Ethics Hotline: 0 850 511 11 12

5. POLICY-RELATED QUESTIONS AND COUNSELLING

In order to ensure that business planning is carried out in accordance with the Policy, questions and consultancy requests can be sent to the Compliance Department e-mail address:

- uyum@aksa.com.tr

Our Corporate Governance Policies are one of the cornerstones of our strategy and an integral part of our business culture.



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