
GLOBAL CONFLICT OF INTEREST 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 created a comprehensive Global Conflict of Interest Policy to communicate with all our stakeholders in an open, transparent and reliable manner. Our policy, which guides conflicts of interest that may arise between our company and our employees, ensures that our corporate identity is presented in a consistent manner.

1. PURPOSE

With this policy, we determine the principles regarding “Conflict of Interest” adopted and implemented by our company in our company activities, in our relations with domestic 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 legal regulations to ensure an honest, transparent and ethical business environment.

This policy; aims to demonstrate our commitment to protecting and enhancing our company's reputation and trust, meeting the expectations of internal and external stakeholders, and managing compliance risks effectively and efficiently.

2. SCOPE

This Policy covers managers and employees in all countries where the Company operates.

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

3. MAIN PRINCIPLES

3.1. Conflict of Interest

In case of conflict of interest;

- Our employee may make decisions that are not in the best interests of our company or may not fulfill his/her duties fully and as required,
- Our employees level of professionalism and independence may be compromised during their duties,
- Reputation of both of our employees and the company may adversely affect,
- Work results produced by an employees may be negatively affected.

To eliminate the risks of conflict of interest, employees;

- Our employees must act professionally and impartially, always acting in the best interests of our company,
- They must not allow the private interests of themselves, their close family members, business partners or any third party to override the interests of our company,
- Our employee should withdraw from the situation and/or refrain from participating in the decision-making process In case of a perceived conflict of interest and inform his/her manager, the Compliance Department or the Human Resources Department.

3.2. Types of Conflict of Interest

The types of conflict-of-interest situations that the employee may encounter in their business activities are as follows:

■ **Clear Conflict of Interest:** A situation when there is a real and clear conflict of interest. For example, if an employee responsible for supplier selection chooses a business partner managed by a close family member as a supplier without considering our company's supplier selection process.

■ **Potential Conflict of Interest:** A situation that has not yet turned into a clear conflict of interest, but is likely to turn into a clear conflict of interest in the future.

For example, to hire an immediate family member of our employee after an appropriate selection process. In this case, we evaluate whether the potential conflict of interest has materialized into a clear conflict.

This policy does not cover all conflict of interest situations that may arise. Our employees must inform any situations in which they suspect a conflict of interest to the Compliance Department, the relevant Compliance Officer and the Manager of.

3.3. Business Processes Involving Conflicts of Interest

Our Company supports open and transparent communication to ensure that conflicts of interest are properly addressed, evaluated and resolved.

In case of potential/detected conflict of interest in business processes following are required:

- Ensuring communication and behaviour in accordance with the requirements of this Policy,
- Our employee, who is in a conflict of interest situation, must inform his/her manager prior to the signing of the official document such as the contracts and withdraw from decision-making processes, including the negotiation process.

All our employees are responsible for informing the Compliance Department in the event of a potential/detected conflict of interest in business processes.

3.4. Secondary Employment

Our employees may not work for another person or organization during business hours in exchange for a fee or similar return.

Employees who wish to work outside of business hours submit their work plan for the approval of their direct supervisors., Compliance Department and Human Resources Department.

3.5. Immediate Family Members

Our employees should inform the Human Resources Department when a close family member works for a supplier or competitor organization.

Our employees must refrain from any kind of situation that could lead to conflicts of interest, such as using their position to hire, advantage or influence favoring conditions of their immediate family members.

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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