

Anti-Bribery

February, 2026

- All members of the organization must respect the confidentiality and correct execution of the work within the parameters set for each process. Any internal or external condition that affects the proper evaluation and execution of a task and benefits the offender will be considered a bribe.
- Situations considered as bribery will not be allowed or tolerated internally (organization) or externally (suppliers) and will be treated as a very serious offense at the disciplinary level. Any activity or tendency that could be considered as an indication of bribery should be reported immediately to the head of your department and/or division, and even directly to senior management in exceptional cases.
- The employee agrees to comply with the anti-bribery requirement described herein, to the extent that he/she is aware of this policy.

Ethics Whistleblowing Policy

Any fraudulent activity or evidence related to what is stated in this policy should be reported as soon as possible, directly following an ethics escalation process. This process will be carried out in accordance with the following priority:

- Department Responsible
- Department Manager
- Human Resources Manager
- Management Team
- Senior Management

If this order cannot be complied with for obvious reasons, you should go directly to the next person in line for escalation. If the person in charge is clearly informed that the complaint has been forwarded to, the identity of the complainant will be kept confidential.

If the complainant deems it appropriate, he/she can use the suggestion box managed by the HR manager, who has the authority to report any irregularity directly to the management team or senior management, anonymously.

Kerem Üzüm
CEO

