



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Document No PO-031	Issued On 4/17/2025	Revised -	Revision No 0
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1. PURPOSE AND SCOPE

Mitaş Industry acts to control bribery and corruption risks and to integrate the principles of compliance, transparency, integrity, and accountability into all business processes. Within this scope, clear and applicable rules have been established for employees, suppliers, customers, and all stakeholders.

This policy aims to protect the company's reputation, corporate values, and sustainability by defining a clear corporate framework for combating bribery and corruption.

2. DEFINITIONS AND ABBREVIATIONS

Bribery: Requesting, offering, giving, or accepting material or moral benefits, directly or indirectly, to obtain an unfair advantage in favor of another person or organization while performing one's duties.

Corruption: Any unethical or unlawful behavior intended to gain personal benefit through the abuse of duty or authority in the public or private sector, including bribery, embezzlement, and abuse of office.

Conflict of Interest: A situation where a personal, financial, or other interest prevents the employee from performing their duties impartially.

Ethics Violation Reporting Procedure: An internal procedure within Mitaş Industry that defines how unethical conduct or bribery/corruption incidents are reported and how these notifications are processed.

Disciplinary Regulation: A regulation defining the rules that Mitaş Industry employees must follow while performing their duties and the sanctions applied in case of violation.

Prohibited Persons List: An official list published by national and international authorities identifying individuals or organizations associated with money laundering, terrorist financing,

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or other criminal activities.

Process Manager: A manager responsible for the implementation and supervision of this policy within their respective business area or function.

UN Global Compact: A United Nations initiative encouraging companies to align with universal principles on human rights, labor, environment, and anti-corruption.

OECD Anti-Bribery Guide: A guideline defining the principles, standards, and practices for combating bribery among OECD member countries.

3. REFERANCES

- OECD Anti-Bribery Guidelines
- United Nations Global Compact
- Turkish Commercial Code (No. 6102) – Financial Transparency and Compliance Principles
- Law on Prevention of Laundering Proceeds of Crime (No. 5549)

4. GENERAL PRINCIPLES

Mitaş Industry adopts a zero-tolerance policy against bribery and corruption in line with the principles of business ethics, transparency, and accountability.

Ensuring full compliance with ethical standards and responsible business conduct in all operations, and maintaining transparent, reliable, and sustainable relations with business partners, are among the company's key priorities.

It is strictly prohibited for any person or organization within Mitaş Industry to offer, give, or receive bribes, directly or indirectly, to obtain any benefit.

All employees, suppliers, customers, and stakeholders are expected to comply fully with the principles defined in this policy and act in ways that prevent bribery and corruption in business processes.

5. METHOD

5.1. IMPLEMENTATION OBLIGATIONS

All companies and business partners involved in the purchase and sale of goods or services must fully comply with this policy and applicable legal requirements and must not appear on any Prohibited Persons List.

If any contrary situation is detected, the relevant cooperation shall be terminated immediately.

To ensure transparency in Mitaş Industry's financial operations and prevent unlawful money movements, full compliance with national and international legislation is the responsibility of process managers.

High-risk transactions must be monitored, and when necessary, the competent authorities



shall be notified to protect the integrity of the financial system.

Employees are prohibited from engaging in private business relationships with customers that may create any service, payment, or personal benefit. They are not allowed to borrow from or lend to customers.

Any direct offers, financial support, or other benefits from customers that fall within the scope of commercial bribery are considered a crime under applicable law and are subject to disciplinary and legal sanctions.

Accordingly, employees are strictly forbidden from accepting any direct or indirect personal payment or bribe.

No offers of donations or assistance are accepted from any person or organization that has a direct or indirect relationship with the company.

5.2. VIOLATION NOTIFICATIONS AND EVALUATION

All suspicious situations or incidents related to bribery or corruption must be reported in accordance with the Ethical Violation Notification Procedure.

The identity of the reporting person shall be protected under the principle of confidentiality, which is guaranteed by the Board of Directors.

The investigation and evaluation of such notifications fall under the authority and responsibility of the Board of Directors, while the Human Resources and/or Legal Department performs the secretariat duties in this process.

If non-compliance is detected following the investigation, the Disciplinary Regulation shall be enforced and necessary actions initiated.

6. APPENDICES

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