

# ASAŞ ALÜMİNYUM A.Ş.

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

**Document Code No.:** GN-PT-07

**Publication Date:** October 23, 2024

**Revision Date/No.:** -/00

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## 1. Purpose

The purpose of this policy is to clearly establish ASAŞ's commitments and approach to preventing bribery and corruption while safeguarding the Company's reputation. This policy, an integral part of the ASAŞ Code of Business Ethics, aims to provide necessary guidance for preventing bribery and corruption across all company operations and establish related responsibilities and rules.

## 2. Scope

This Anti-Bribery and Anti-Corruption Policy applies to all ASAŞ employees and business partners who act on behalf of or provide services to ASAŞ.

This policy applies to:

- All ASAŞ employees and Board members,
- Consultants, legal advisors, and service providers, and their employees,
- Subcontractors and their employees,
- Representatives, distributors, and branches operating, directly or indirectly, for ASAŞ.

This Policy:

- is an integral part of ASAŞ's Code of Business Ethics, Management Policy, and HR Practices,
- as approved and announced by

the ASAŞ Board of Directors.

It is important to note that all practices and restrictions mentioned in this policy apply to the aforementioned individuals and organizations. Note that unlawful or unethical behavior by these individuals or entities may also hold the Company accountable. Therefore, when selecting business partners, the ASAŞ Code of Business Ethics, relevant regulations and procedures, as well as this policy document, must be taken into account, and business partners must be ensured to act in compliance with these rules.

## 3. Definitions and Abbreviations

**“ASAŞ” or “Company”:** ASAŞ Alüminyum San. ve Tic. A.Ş.

**Board of Directors:** ASAŞ Alüminyum San. ve Tic. A.Ş. Board of Directors

**Ethics Committee:** The committee appointed by ASAŞ Alüminyum San. ve Tic. A.Ş. Board of Directors.

**Internal Audit Unit:** The department responsible for internal auditing at ASAŞ Alüminyum San. ve Tic. A.Ş.

**Donation:** Monetary or in-kind contributions (products, services) provided to individuals or organizations, including associations, unions, non-profits, universities, schools, and other private or public institutions, without expectation of return, to serve public benefit or social goals.

**Business Partners:** Suppliers, distributors, representatives, subcontractors, and consultants who act on behalf of the Company.

**Facilitation Payments: Unofficial,** improper payments made to secure or expedite routine government services that the payer is legally entitled to receive.

**Undue Benefit:** Any benefit obtained through one party's improper violation of their duties and responsibilities in an improper manner to provide benefit to an associated party.

**Corruption:** The abuse of authority, directly or indirectly, for personal gain through misuse of one's position or authority.

**Corruption Inducement:** Improperly encouraging others to misuse their position or authority.

**Gifts:** Items received without payment as gestures of gratitude or courtesy in business relationships.

**Bribery:** The act of a person agreeing with another person, either directly or through intermediaries, to secure, offer, promise, request, or accept a benefit or advantage for performing, causing to be performed, not performing, expediting, or delaying an action related to their duty. It also includes facilitating such actions in a manner that contradicts the obligations of their role, thereby providing a benefit to themselves, the requesting party, or another party involved in the relationship.

Bribery and corruption can take these forms, including but not limited to:

- Cash payments,
- Political/charitable donations,
- Commissions,
- Social benefits,
- Gifts and hospitality, and
- other benefits.

#### **4. Duties and Responsibilities**

##### **Board of Directors:**

- Has ultimate responsibility for the Anti-Bribery and Anti-Corruption Policy,
- Approves this policy and ensures its implementation,
- Establishes and enhances internal control systems to prevent bribery and corruption,
- Creates communication channels for reporting policy violations while protecting reporters' confidentiality and security, and
- Conducts audits and implements corrective measures to maintain compliance with laws, regulations, procedures, and policies..

##### **Ethics and Disciplinary Committee:**

- Ensures adherence to the ASAŞ Code of Business Ethics, fostering an ethical culture throughout the Company, and enhancing awareness and understanding of these principles,
- Evaluates ethical concerns, makes informed decisions, and offers guidance on the implementation of the Code of Ethics and the Anti-Bribery and Anti-Corruption Policy,
- Examines complaints and reports, initiates investigations through the Internal Audit Unit when required, and Takes action when violations are confirmed.

##### **Human Resources:**

- Develops and implements procedures to promote awareness and understanding of the policy and ensures its enforcement through HR processes, and
- Oversees employee training on the policy and prepares an annual report for the General Manager or CEO, summarizing the frequency of training sessions and the number of employees trained.

##### **Internal Audit Department:**

- Systematically reviews bribery and corruption risks and incorporates them into relevant audits, and
- Investigates potential policy violations flagged by the Ethics and Disciplinary Committee in compliance with ASAŞ regulations and reports its conclusions to the Ethics and Disciplinary Committee.

##### **All ASAŞ Employees:**

- Must comply with this Board-approved Policy,
- Must complete Anti-Bribery and Ethics Code training, and
- Must report any Policy violations through proper channels.

#### **5. Code of Practice**

##### **5.1. Company and Business Partner Selection**

In selecting companies and business partners for the procurement and sale of goods and services, senior management evaluates key criteria, including experience, financial performance, technical qualifications,

ethical standards, and historical conduct. Any company or potential business partner flagged for bribery or corruption concerns will be excluded from consideration, regardless of their qualifications in other areas. Senior management holds primary responsibility for conducting due diligence and evaluations before initiating any business relationship. The Internal Audit Department ensures compliance with these principles during routine audits. Contracts with qualified companies and business partners must require:

- Full compliance with this Policy and relevant regulations,
- Employee adherence to these principles, alongside a commitment to uphold them,
- Regular training for employees on the Policy,
- Frequent reminders about reporting obligations, the Ethics Line, and encouragement to report any violations, and
- ASAŞ's audit rights for suspected bribery or corruption cases.

Additionally, agreements and contracts must explicitly state that non-compliance with these provisions or any breach of the Policy may result in the justified termination of the business relationship or existing contracts.

## **5.2. Gifts**

ASAŞ employees must not accept gifts or benefits that could compromise their impartiality, influence their decisions, or affect their behavior. Similarly, they must not offer such gifts or benefits to third parties or organizations. Employees must not accept gifts or benefits exceeding \$50 in value or any that could compromise their impartiality, decision-making, or professional conduct.. Accepting gifts or benefits explicitly tied to a favor or return is forbidden. Bribes or commissions, whether given, received, or offered, are strictly prohibited under all circumstances.

When employees are offered gifts, meals, or hospitality exceeding the outlined limitations, they must politely decline and explain ASAŞ's ethical rules. However, if refusing the gift would offend the giver or if the circumstances make refusal impractical, the employee may accept the gift, provided they inform their manager of the situation. The rules and procedures governing gift exchanges between ASAŞ employees and third parties or organizations in business relations are detailed in the ASAŞ Code of Business Ethics Implementation Principles Regulation.

## **5.3. Facilitation Payments**

Individuals and entities covered by this Policy are prohibited from offering facilitation payments to secure or expedite routine processes with government agencies, such as obtaining permits, licenses, or official documents. If there is any uncertainty about whether a requested payment constitutes a facilitation payment, they must refrain from making the payment and report the matter to the Ethics Committee for review and guidance.

## **5.4. Donations**

ASAŞ does not make payments or provide financial or in-kind contributions to political parties, politicians, political organizations, their representatives, candidates, or any other entities to facilitate, directly or indirectly, any transactions involving the Company. The authority to approve other donations and contributions related to social responsibility projects and corporate representation lies with the Board of Directors.

## **5.5. Political Activities and Business Relations with Government Employees and Politically Influential Persons**

ASAŞ's resources and assets must not be used to support political activities, make donations to political parties, or contribute to political campaigns. Employees are permitted to engage in political activities on an individual and voluntary basis; however, they must not: request colleagues, customers, or suppliers to participate in political tasks, pressure others to join a political party or work on behalf of one, or solicit donations or contributions to associations or similar organizations. The rules and procedures governing ASAŞ employees' political activities are outlined in the ASAŞ Code of Business Ethics Implementation Principles Regulation.

If ASAŞ employs a government employee or a politically influential individual, all decisions must adhere to ethical standards to ensure that such employment is never seen as an attempt to induce corruption or secure an undue benefit. On the other hand, Government Employees or Politically Influential Persons may be employed or engaged in business relations, provided that:

- The transaction serves a legitimate and lawful purpose,
- The employment does not suggest any intention to secure an undue benefit or engage in unlawful activities,

- The individual objectively possesses the necessary qualifications for the relevant position, and
- Salaries and benefits are determined based on the job description and the candidate's qualifications.

## **5.6. Conflict of Interest and Abuse of Position**

All employees are responsible for ensuring that the company's resources, name, identity, and influence are not used for personal gain and to avoid situations that could tarnish the company's reputation and image. ASAŞ employees are prohibited from entering into personal business relationships with ASAŞ customers, suppliers, subcontractors, or other individuals and/or organizations with whom ASAŞ has commercial relations. Borrowing money, receiving or offering personal discounts, or exchanging goods or services for personal purposes is not allowed. If an ASAŞ employee encounters a potential conflict of interest, they must inform the relevant department line manager and the Local Ethics Advisor in advance. Exceptions Require the Approval of the Board of Directors

ASAŞ employees must not engage in activities that would, directly or indirectly, classify them as "merchants" or "tradespersons." They are prohibited from working for another person or entity in exchange for money or any other benefits, whether during or outside of work hours. If an employee is to assume a position as a board member or auditor at companies outside ASAŞ, prior notification of the ASAŞ Board of Directors is required. The use of the Company's assets, resources, or personnel for external purposes is strictly prohibited, unless it directly serves the Company's interests. The rules and procedures governing potential conflicts of interest and abuses of position for ASAŞ employees are detailed in the ASAŞ Code of Business Ethics Implementation Principles Regulation.

## **5.7. Protection of Confidential Information**

Confidential information refers to any financial, strategic, technical, commercial, or employee-related data belonging to ASAŞ, as well as matters covered by confidentiality agreements with third parties, which are unknown to third parties and could harm the Company and/or its stakeholders if disclosed. Protecting the private information of ASAŞ employees, customers, suppliers, and stakeholders is of critical importance. This information must not be shared with third parties without the explicit consent of the owner. The principles governing the protection of confidential information are outlined in the ASAŞ Code of Business Ethics Implementation Principles Regulation. The principles governing the protection of "**Confidential Information**" are detailed in the ASAŞ Code of Business Ethics Implementation Principles Regulation.

## **5.8. Accurate Record-Keeping**

All transaction records must be accurate, transparent, complete, and timely, with every transaction documented in the accounting archives in accordance with applicable laws and standards. Entries in the accounting records must include clear and comprehensive explanations and, when necessary, be supported by relevant documents such as invoices. Records and supporting documents must be sufficiently clear and detailed to enable a third party reviewing the transactions to fully understand their purpose and method of execution. Transactions must never proceed without corresponding entries in the accounting records. Likewise, failing to document assets or unlawfully altering, falsifying, or misusing recorded transactions is strictly prohibited under all circumstances. All recorded transactions are subject to periodic, risk-based audits conducted by the Internal Audit Department.

## **6. Reporting Policy Violations and Applicable Sanctions**

All ASAŞ employees are required to promptly report any incidents or suspicions of bribery, corruption, or other unethical behavior to their line managers and/or through the designated communication channels listed below. Examples of such incidents include, but are not limited to:

- Receiving a bribery offer directed at you or a colleague,
- Witnessing or becoming aware of conflicts of interest or vested interests,
- Detecting irregularities in Company records,
- Observing favoritism or undue benefit in tenders or procurement processes,
- A customer or supplier receiving benefits in violation of laws or ASAŞ regulations,
- Any individuals or entities, whether internal or external to ASAŞ, pressuring you or your colleagues to act against the ASAŞ Code of Business Ethics or this policy.

In such situations, employees must immediately report the matter to their line manager and/or use the designated communication channels provided below. Employees may hesitate to report violations for fear of retaliation. However, the Board of Directors assures that individuals who report or raise concerns about violations of legal regulations, the Code of Ethics, or ASAŞ policies will not face any form of retaliation. The identity of whistleblowers must be kept strictly confidential, and they must be safeguarded against any harm resulting from their reports or complaints, except in cases where such complaints are proven to be intentionally malicious or false.

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Violations of this policy will result in disciplinary actions and, where applicable, legal sanctions: Confirmed violations will trigger disciplinary measures under the ASAŞ Disciplinary Directive. Bribery and corruption cases requiring legal action will be reported to the Public Prosecutor's Office. Supplier or partner violations will trigger contract sanctions, including possible termination of business relations. The Company ensures employees who refuse to participate in bribery will not face any penalties, retaliation, or adverse consequences.