
GLOBAL CONFLICT OF INTEREST POLICY



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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

This policy defines the principles regarding conflict of interest adopted and implemented by our Company across its operations and in its relations with national and international public institutions as well as the private sector.

2. SCOPE

This policy covers all our managers and employees of our Company across all our operating countries.

All Business Partners are obligated to meet the required ethical standards we expect in all 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 aligned with the interests of our Company or may fail to perform their duties fully and properly.

- It may result in a reduced level of professionalism and independence that our employee is expected to demonstrate while performing their duties.
- It may adversely affect the reputation of our employee and our Company.
- It may harm the outcomes of the work performed by our employee.

To eliminate the risks of conflict of interest;

- Our employees must act professionally and maintain their impartiality, always acting in the interests of our Company.
- Our employees must not allow their own interests, those of their close family members, business partners, or any third party to take precedence over the interests of our Company.
- In the event that a potential conflict of interest is perceived, our employee must withdraw from the situation and/or refrain from participating in the decision-making process and inform their Manager, the Legal and Compliance Department, or the Human Resources Department.

3.2. Types of Conflict of Interest

The types of conflicts of interest an employee may encounter in business life are as follows:

■ **Actual Conflict of Interest:** A situation when there is a real and clear conflict of interest.

For example, an actual conflict of interest may occur if an employee responsible for vendor selection chooses a business partner managed by a close family member as a supplier, without taking our Company's vendor selection process into account.

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

For example, hiring a close family member of a Company employee after a proper selection process can be given as an instance. In this case, we conduct an assessment to verify whether the potential conflict of interest has turned into an actual conflict of interest.

This policy does not cover all conflict of interest situations that may arise. Our employees inform the Legal and Compliance Department, the relevant Compliance Officer, and their Manager regarding any situations where they suspect a conflict of interest.

3.3. Business Processes Involving Conflicts of Interest

We support 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 involved in a conflict of interest must inform their manager prior to signing official documents such as contracts, and withdraw from decision-making processes, including negotiations.

All our employees are responsible for informing the Legal and 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, Legal & 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

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

