
GLOBAL ANTI-BRIBERY AND CORRUPTION 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 established a comprehensive Global Anti-Bribery and Anti-Corruption Policy to communicate with all our stakeholders in an open, transparent and reliable manner. In this way, we aim to provide a business environment aligns with our ethical standards by adopting a preventive approach against the bribery and corruption risks we face today.

1. PURPOSE

With this policy, we determine the principles adopted and implemented by our company in combatting harmful practices such as “bribery” and “corruption” in our activities and in our relations with national and international public institutions and the private sector.

2. SCOPE

This Policy covers our managers and employees of our Company in all operating countries, as well as suppliers and third parties providing services on behalf of our Company.

Suppliers providing services for our Company are required to comply with the rules defined in our Aksa Energy Global Supply Chain Policy.

3. MAIN PRINCIPLES

3.1. Anti-Bribery and Anti-Corruption

Article 10 of the United Nations Global Compact emphasises that businesses should work against all forms of corruption, including extortion and bribery.

We adopts the principle of conducting our activities in compliance with the national and international legal regulations on anti-bribery and anti-corruption and integrity commitments in force.

We prohibits any forms of bribery and/or corruption, including payments to facilitate and/or expedite our operations, even if such payments are not defined as an act contrary to the laws of the countries inwhere it operates.

Our employees are required to comply with and act in accordance with this Policy, as well as the legal regulations of the countries in which we operate. If circumstances indicate a potential violation of this Policy, every employee is required to notify the Legal and Compliance Department.

Compliance with this Policy is the responsibility of all our employees, and it is essential that our senior management takes leadership in ensuring compliance with the Policy.

For our employees found to have violated this Policy, we apply the provisions set forth in the Disciplinary Regulation, in addition to fulfilling any other obligations required by law. If the parties committing the violation are Business Partners acting on behalf of our Company, we will evaluate whether to terminate all relations with the relevant parties.

In cases not explicitly addressed in this Policy or where there is uncertainty, the Legal and Compliance Department shall be consulted before taking any action.

3.2. Relations with Private Sector and Public Sector

We conducts our relations with public and private sector organizations in the countries where we operates in accordance with this policy.

Our employees who communicate with Public Representatives or Private Sector organization managers comply with local laws and our company's policies during the communication process.

Our employees shall inform the Compliance Officers, their respective managers, and the Legal and Compliance Department of any requests for bribes or facilitation payments made to them in the course of communication to achieve a business objective.

3.3. Individual and Entities Operating on Behalf of the Company (Business Partners)

All individuals and legal entities (Business Partners) acting on behalf of our Company shall conduct their business activities in compliance with:

- The anti-bribery and anti-corruption laws of the countries in which they operate;
- This Policy; and
- Aksa Energy Global Corporate Compliance Program Policy.

We reserves the right to verify whether our business partners conduct their activities in accordance with our company policies specified above.

If our Company considers parties acting or seeking to act on our behalf to be high-risk, we conduct due diligence. The process includes questions designed to collect information about Business Partners in order to assess the level of risk arising from their past activities and/or related to the contract and to identify potential mitigation measures. The due diligence questions aim to investigate the structure of Business Partners and whether the legal entity or members of the Board of Directors have engaged in any improper conduct in their past activities that may be associated with bribery.

Our employees contact the Legal and Compliance Department for support with the due diligence review. Based on the details of the planned engagement provided by our employees, the Legal and Compliance Department determines the level of due diligence information to be requested from the Business Partner and informs the relevant employees so that the applicable form can be sent to the company.

Subject to our Company's capabilities, the Legal and Compliance Department shares the results and assessments of the due diligence with the relevant employees within a reasonable period. The commercial decision to be made based on the results and assessments provided is the responsibility of our Company's managers.

3.4. Conflict of Interest

Conflict of interest refers to situations where an employee's personal interests, directly or indirectly, may prevent their ability to make decisions, conduct evaluations and/or perform their professional responsibilities in the best interests of the Company.

Our employees are obliged to avoid individual interests, situations that may be misunderstood and interpreted as individual interests.

Comprehensive information and explanations regarding conflicts of interest are set forth in our Aksa Energy Global Conflict of Interest Policy.

3.5. Gift and Hospitality

Our employees are obliged to act in the best interests of our company and should not prioritize their personal interests when making decisions in their activities related to our company. Gifts and hospitality may be used in activities aimed at establishing and developing business relationships; however, it is important that gifts and hospitality are received and/or given in accordance with certain rules.

Gifts and hospitality should not be considered as personal interest by any of our employees, and each offer or acceptance of gifts and hospitality should be evaluated and decided in detail.

The rules, limits, and approval procedures regarding the acceptance and offering of gifts and hospitality are set forth in our Aksa Energy Global Gifts and Hospitality Policy.

3.6. Donations and Sponsorships

We aim to support donation and sponsorship activities that strengthen social living standards in the regions where we operate.

In accordance with the rule of “transparency” in our activities, we define the approvals that must be obtained before donation and sponsorship plans, and provide information about donations and sponsorship activities that should not be carried out.

Donations or sponsorship activities that may violate the laws, damage the reputation and brand value of our company, or cause conflict of interest should not be made.

The donation in which our company is involved should be based on causes that have a positive impact on society, with no expectation of improper benefits. In addition, each sponsorship must be in line with our company's brand-themed plans.

Donations and sponsorship activities should not be undertaken if they are likely to be evaluated as attempts to obtain improper benefits or if they pose a risk to our company's image and reputation.

Detailed rules and approval procedures regarding donations and sponsorships are set forth in our Aksa Energy Global Donations and Sponsorships Policy.

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

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

