

## **ANTI-BRIBERY AND ANTI-CORRUPTION POLICYCODE OF ETHICS AND CONDUCT**

### **A. PURPOSE**

The purpose of the Anti-Bribery and Anti-Corruption Policy ('the Policy') is to ensure the compliance of Ahlatcı Kuyumculuk San.ve Tic.A.Ş. ('the Company') with legal regulations against bribery and corruption, ethical and professional principles, and universal rules.

### **B. SCOPE**

The Anti-Bribery and Anti-Corruption Policy covers all Company employees including the Board of Directors as well as intermediaries, proxies, suppliers, contractors, third persons, affiliated agencies and coworkers. This Policy is an inseparable part of the Ethical Principles and other internal regulations adopted by the Board of Directors and all employees as well as Company regulations and other legal regulations.

### **C. DEFINITIONS**

Bribery is a person's gaining unfair advantage upon acting in violation of the requirements of their duty by performing or not performing, speeding up or slowing down a specific work within the framework of an agreement they reached with a third person. Corruption is direct or indirect bribery, and the act of offering, demanding, giving or accepting bribery or all sorts of other illegal benefits, which prevents the person from executing their duty in line with the laws or from performing the required acts.

### **D. POWERS and RESPONSIBILITIES**

It is the duty of the Company's Board of Directors to ensure the Anti-Bribery and Anti-Corruption Policy is established, applied and updated. The Company shall impose disciplinary sanctions if the employees act in violation of these principles. The CEO shall be assigned by the Company Board to the task of investigating such cases. Company employees shall be responsible for filling in a complaint form to report to the CEO any suspicious or uncertain cases including bribery and corruption. The CEO shall examine such forms completed by Company employees but the identity of the reporting employee and the contents of the report shall be kept confidential. At the end of the investigation, if necessary, the reporting employee shall receive feedback.

### **E. MAJOR RISK AREAS FOR ACTS OF BRIBERY AND CORRUPTION**

The Company aims full compliance with the relevant laws, regulations and principles, and shall never tolerate any act of bribery or corruption irrespective of its purpose. Any business relations with third parties that wish to receive services from the Company through bribery shall be terminated. The major risk areas where bribery and corruption may take place are described in detail below:

**Gifts and Business Hospitality:** A gift is a product which is usually given by customers or persons having a business relationship with the Company as a means of appreciation or commercial courtesy and does not require a financial payment. All gifts given to third parties by the Company shall be offered explicitly and unconditionally in good faith. Although the same principles apply for accepting a gift, gifts which are not customary and have a nature and value that could result in a sanction must not be accepted except for symbolic gifts given in line with these principles. In order to build commercial communication networks and improve commercial relations, business hospitality may be offered to clients, consultants, lawyers, auditors and other companies with which the Company has business relations. The Company shall offer such business hospitality to third parties explicitly and unconditionally in good faith. Even if it complies with this Policy, no gifts or business hospitality that could lead to a conflict of interest or could be perceived as such shall be offered or accepted.

*Political Donations:* No politically-motivated donations shall be made in the name of the Company.

*Outsourcing Companies and Business Partners:* Before considering an outsourcing company for support services, among others, or a business partner, the Company shall conduct due diligence and not work with those persons and companies that prove to be notorious for bribery or corruption. Outsourcing companies and business partners shall be obliged to comply with this Policy and other relevant regulations. The Company shall inform the said companies and business partner on their obligation to follow this Policy. Business relations with any persons and companies that do not follow the said principles and other relevant regulations shall be terminated. *Facilitation Payments:* The Company shall not allow the persons or companies covered by this Policy to offer facilitation payments in a bid to secure or speed up a routine transaction or procedure before public agencies.

#### **F. F. POLICY VIOLATIONS AND SANCTIONS**

All Company employees shall be responsible for complying with this Policy as well as all legal anti-corruption regulations. If Company employees violate the principles of this Policy, disciplinary action including termination of employment shall be taken depending on the nature of violation. In addition, those who fail to follow the legal anti-corruption regulations in force might face penal sanctions. It is unacceptable for an employee to face mistreatment for refusing to participate in an act of bribery or corruption, reporting any violations of the principles in this Policy or expressing any concerns on possible corruption cases in the future.

#### **G. EDUCATION**

As a legal requirement, all Company employees shall be regularly provided with trainings on 'AntiMoney Laundering and Counter Terrorist Financing (AML/CTF) Measures' and 'Competition Law'. The said training events shall be held under the support of Ahlatçı Kuyumculuk San.ve Tic.A.Ş. Human Resources Department.

#### **H. REVIEW**

This Policy shall be reviewed and updated as required on a regular basis.

#### **I. ENTRY INTO FORCE**

The Anti-Bribery and Anti-Corruption Policy shall enter into force after it is approved by the Board of Directors.