



COMPLIANCE

**GLOBAL
ANTI BRIBERY AND
CORRUPTION POLICY**

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Through this Policy, Company aims to declare its commitment to prohibiting bribery and corruption and to be in compliance with applicable anti-bribery laws and guiding for identifying and avoiding potential bribery and corruption actions to preserve its integrity and reputation.

1. DEFINITIONS

“Beko” or “Company” refers to all companies directly or indirectly, individually or jointly controlled by Arçelik A.Ş. and its joint ventures.

Bribery: A propose to give or receive “anything of value” with the aim to corruptly influence or obtain improper advantage over a business transaction or relationship.

a. **“Improper Advantage”** is a benefit obtained through the violation of one's own duties and responsibilities in order to provide an advantage to the other related party Company

b. **“Undue influence”** means providing an offer, payment, or promise with the aim of impacting others to take advantage of their official position for Company's or one of Company's business partner's benefit.

“Business Partner” includes suppliers, distributors, dealers, authorized services and other third parties with whom the company has a business relationship and all kinds of representatives, subcontractors, consultants, etc., acting on behalf of the company, as well as their employees and representatives.

“Cash or Cash Equivalent” includes but not limited to money, gift certificates, gift cards, discounts, securities, precious metals (for example, gold, silver or jewelry) or fuel coupons, ticket compliments and similar documents with a specific value.

Facilitation Payment: In order to expedite a routine service, it is an unofficial, improper, small payment made to secure or accelerate the legitimate operation of the paying party.

“Gift” refers to any item or benefit with material value, whether given or received directly or indirectly through intermediaries, such as discounts, gift cards, promotional products, promise of employment, cash and cash equivalents loans, memberships, services, privileges. **“Hospitality”** includes meals, short or long-term accommodation, travel and transport, social events for sporting, cultural or other purposes.

Sponsorship: Any action which is to make any cash or non-cash payment for the activities that are organized by an individual, professional organization or entity with an expectation that it will provide benefit for Company.

The UN Global Compact: is a global pact initiated by the United Nations (UN) to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labour, the environment and anti-corruption.

"Politically Exposed Person (PEP)" refers to individuals who are currently or in the past, either or in a foreign country, elected or appointed to an important public function; board members, senior executives and deputy executives of international organizations and other persons holding equivalent positions; senior politicians; senior officials of political parties; senior judicial, administrative or military officials; senior executives of state-owned enterprises; and the spouses, first-degree relatives (mother, father and children) and relatives of all such persons.

Government/Public Official: It is broadly defined to involve a variety of individuals, including but not limited to the followings:

- Employees working at government bodies (such as public officials, policemen)
- Employees of government business enterprises,
- Employees of political parties, political candidates,
- Any person who holds a legislative, administrative or judicial position, (domestic or in a foreign country),
- Any person who fulfils a public service for a country,
- Judges, jury members, or other officials who work at domestic, foreign or international courts,
- Officials or representatives working at national or international parliaments,
- Arbitrators resorted to, who have been entrusted with a task within the arbitration procedure, in order to resolve a legal dispute.
- Officials or representatives working at international or supranational organizations that have been established based on an international agreement.

Forms of Value:

The following examples run the risk of being perceived as potentially providing improper benefits;

- Gifts, Hospitality³
- Hiring Family Members of Public Officials
- Donations, sponsorships and other Types of Value – (Tickets for sports activities, rebates, samples, free goods, and other trade and merchandising programs.)

Politically Exposed Persons: refers to individuals who are or have been entrusted with prominent public functions, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials, senior management of the international organizations, and family members and close associates of such persons

2. GENERAL PRINCIPLES

Company, which is affiliated with Koç Holding A.Ş., is a signatory party to the UN Global Compact, by which it is aimed to work against corruption and bribery all over the world. Within this view, Company does not permit or accept the bribery in any form. Independent from local practices or regulations, Company does not tolerate any kind of bribes, corrupt payments, facilitation payments, or inappropriate gifts and entertainment to anyone involved in Company's business cycle.

Company acts in compliance with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act ("UKBA"), and the local laws in every country in which Company operates.

Legal and Compliance Directorate defines anti-bribery-related trainings on an annual basis to Company employees and monitors their completion without delay.

³ See Global Gift and Hospitality Policy.

Incompliant actions may result Company to be punished through several measures including but not limited to the followings: invalidation of the licenses granted by the public authorities; seizure of the goods which are used in the commitment of, or the result of, a crime by the representatives of a legal entity; Administrative and/or penal sanctions on Company employees and seizure of financial benefits arising from or provided for the commitment of a crime, and most importantly, exposes firstly Company and Koç Group to significant reputational harm.

This Policy can be supplemented with the local obligations which are more stringent than the obligations stated in this Policy to comply with local laws or regulations.

3. RULES

a. Gifts, Meals, Travel and Hospitality

Providing or accepting gifts, meals, travel, or entertainment to affect any party inappropriately, especially a Public Official, in exchange for any improper benefit is strictly prohibited. Under some specific conditions, providing gift to a Public Official or accepting a gift from a third party may be allowable as described in Global Gift and Hospitality Policy⁴.

b. Hiring or Engaging with Public Officials and Politically Exposed Persons

Business relationships and employment decisions must be based on virtue and this should not inappropriately influence Public Officials. There must be approval before proceeding with the recruiting process, if a known family member or designee of a Public Official is seeking employment at Company.

Public Officials and Politically Exposed Persons can be hired or engaged to perform services that have a legitimate business purpose by Company, provided that:

- There is no expectation that the person is being retained by the Company in exchange for any improper action or business advantage from the government,
- The person/s is/are objectively qualified enough in terms of the criteria required for the related position,
- The salary or fees are reasonable and consistent with the work and the related person's professional qualifications,
- Prior approval is obtained from the Sustainability and Corporate Affairs Directorate and Chief Legal and Compliance Officer.
- The employment of the individual does not create a perception of improper advantage, suggesting that the individual is being hired in exchange for a business advantage or an improper action,
- The relationship has a legitimate business purpose and is regularly evaluated, and appropriate actions are taken when necessary.

Company's employees and business partners are prohibited from making facilitation payments on behalf of a Company.

c. Grants, Donations and Sponsoring

It is prohibited to undue influence a Public Official/PEP (and other parties as may be specified in the relevant legislation applicable to Company in the jurisdictions where they operate) or a third party in exchange for an improper advantage or benefit, and/or to improperly encourage corruption by the way of providing a grant, a Donation, or a Sponsorship.

It is strictly forbidden to make donations or to provide any type of in-kind or cash contribution under any name to any political party on behalf of Company. Donations and Sponsorships should only be made/provided, in accordance with the rules and principles set forth in the Company Global Donations and Sponsorship Policy.

⁴ See Global Gift and Hospitality Policy

d. Third Party Relationships

Business Partners must act in accordance with this Policy under all conditions. To reduce the risk of bribery and corruption, a risk-based Due Diligence should be conducted on third parties both before and during the business relationship.

In order to eliminate the risk of Bribery and Corruption, we do not tolerate in any way, improper transactions concealed under the name of “commission” or “consultancy fee” to hide the real purpose. In this context, Company establishes business relationships with Business Partners only under the following conditions:

- if there is a legitimate business interest for the services or products obtained,
- if the Due Diligence conducted about the Business Partner has been completed positively,
- if the necessary protective provisions ensuring compliance with the legislation on the Anti-Bribery and Corruption exist in the signed contract and
- if the signed contracts do not contain unusual provisions (such as payment terms significantly above or below market conditions) that would give rise to a perception that the true nature of the transaction is intended to be concealed.

No relationship should be established with a Third Party who has or will have a substantive interaction with Public Officials on behalf of Company without a Due Diligence inquiry into the third party’s background, qualifications and reputation.

Contracts made with Third Parties acting on behalf of Company should include an appropriate language regarding all applicable anti-bribery and corruption laws.

e. Transparency and Accuracy of the Books and Records

Books and records shall be kept in an accurate, transparent, complete, on a timely manner; all transactions shall be evidenced and registered, reflecting the accordance with the applicable laws, regulations, and accounting standards.

Accounts and invoices must be fully and clearly explained, vague expressions should be avoided in the explanations, and where necessary, properly documented evidence. The clarity of the explanations and supporting documentation should enable a third-party reviewer to easily understand the transaction and the rationale behind it.

Unrecorded funds or assets are strictly prohibited, and records must not be falsified for any purpose.

Books and records are subject to periodic risk-based audits.


4. AUTHORITY AND RESPONSIBILITIES

This Policy is published by Company Legal and Compliance Directorate, and the Company is responsible for ensuring the compliance with the Policy by all its employees. In addition, regarding the Company’s position for corrective and/or preventative actions, including termination of employment, against any non-compliant behaviors should be considered regularly via related parties.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Company Global Code of Conduct, you may report the incident to the Compliance Officers via;

Web: www.ethicsline.net

You may reach the Ethics Hotline Numbers from the web page below;
<https://www.bekocorporate.com/company/about-us/global-code-of-conduct/>



Compliance Officers are employees of the Company appointed by the Chief Legal and Compliance Officer of Company as being responsible for monitoring the Company's operations pertaining to this Policy.

If there is a discrepancy between the local regulations, applicable in the countries where Company operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.

Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

This Policy will be periodically reviewed by the Company Legal and Compliance Directorate to ensure compliance with new or revised laws and regulations.

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