

<b>TEKLAS</b>	<b>POLICY of ANTI-BRIBERY &amp; CORRUPTION</b>	<b>REV.NO</b> 2	<b>PAGES</b> 1/2
<b>010.1.23</b>	<b>Policy of Anti-Bribery &amp; Corruption</b>		

## 1. PURPOSE

The purpose of this policy is to establish Teklas' commitments to prevent bribery and corruption in all activities in accordance with the relevant legal regulations and national and international ethical values, to provide the necessary information, to determine the responsibilities and rules in this regard and to share them with all stakeholders as a complementary part of the ethical principles and sustainability objectives within Teklas Code of Ethics and Values Policy.

## 2. SCOPE

This policy covers all Teklas employees, stakeholders and all stakeholders, including Members of the Board of Directors and their senior executives.

All subjects in question are expected to comply with this policy in their business dealings related to Teklas.

## 3. BRIBERY AND CORRUPTION

Teklas stands against all forms of bribery and corruption.

Any employee who witnessed bribery or corruption or intended to be done is obliged to report it to the Teklas Ethics Committee ([ethics@teklas.com.tr](mailto:ethics@teklas.com.tr)). Otherwise, this is considered malicious behavior and is considered in the Ethics Committee.

If the persons proven to be corrupt and/or corrupt are employees of Teklas, 'termination of the employment contract for the right reason' is applied among the sanctions specified in teklas Code of Ethics and Values Policy.

Any business partner who is proven to be corrupt and/or corrupt is cut off from Teklas.

## 4. PURCHASING AND SALES PROCESSES

**Purchasing Processes:** In Teklas, all purchases are carried out within transparent business processes and in accordance with objective criteria. In the purchase of goods and services, it is essential to work with suppliers who provide added value by taking responsibility for supply directly, who do the billing in person, and who bear financial and legal responsibility.

All other application details in the purchasing process are described in the Purchasing Procedure.

**Sales Processes:** All sales processes of Teklas are carried out centrally. Teklas works directly with its customers. It communicates directly with its customers through the customer's corporate authority or through the brokerage or persons authorized to represent them officially.

## 5. RELATIONS WITH BUSINESS PARTNERS

When dealing with suppliers, offers are received and evaluated in accordance with the purchase policy. Otherwise, a technical report is created within the scope of the reason for evaluating the high bid.

Date of Release	Revision Date	Prepared by/ Revised by	Controlled by	Publication Approval
12.02.2021	09.08.2021	Sinem ŞEN HR&Corp. Com. Assistant Specialist	Ela GÖZEGER Long Term Intern	Gülsünay UYSAL KABA Global HR Director

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**6. TAKING OR GIVING GIFTS**

Teklas employees cannot accept or give gifts of any material value. The details will be as in the Teklas Code of Ethics and Values Policy.

**7. RECRUITMENT PERIOD**

During the recruitment of specific positions, extensive résumé and reference scans are carried out within the knowledge and approval of the person beyond the existing human resources procedures.

**8. ACCOMODATIONS**

The business partners of Teklas are hosted in the same way with the same treats in our facilities. Nobody is given a privilege. If our business partner comes from another city, an accommodation can be provided through contracted hotels in the city where our facility is located.

**9. REVISION HISTORY**

REVISION NO.	DATE	EXPLANATION
0	13.04.2020	First publication.
1	12.02.2021	It has been reviewed.
2	09.08.2021	It has been reviewed and edited according to current practices.

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