



ŞİMŞEK AMBALAJ

PRINCIPLES OF ANTI-BRIBERY AND ANTI-CORRUPTION

Şimşek Ambalaj has adopted the principle of operating in compliance with laws and regulations regarding bribery and corruption, universal legal rules and ethical principles. Within the scope of this principle, it proceeds with “zero tolerance” approach against bribery and corruption and undertakes to carry out its activities in a fair, honest, legal and ethical manner. This policy is an integral part of the ethical values, other internal company regulations and legal regulations adopted by the Senior Management and all employees.

The fight against bribery and corruption applies not only to company employees, but also to all business partners who act on behalf of the company or provide services to the company.

RULES:

There should not be any person or company from whom negative intelligence regarding bribery or corruption has been received regarding our suppliers, subcontractors, consultants, employees, customers and all business partners with whom we are likely to work. The responsibility of conducting the necessary market research before starting work belongs to the relevant process manager.

1. Gifts, Meals, Travel and Entertainment

Employees are prohibited to accept any offer of goods/services, gifts, invitations or hospitality that may affect or aim to affect their preferences and decisions for personal or third party benefit. They are also prohibited to make, receive, give, promise or demand such offers, including but not limited to these.

During any carrying on tender, negotiation, purchasing process, or any activity carried out at, including but not limited to these, giving or receiving of gifts, checks, cash or cash equivalents, regardless of their value, will not be tolerated at Şimsek Ambalaj.

No relationship should be entered into between Şimşek Ambalaj employees and third parties that may create the impression of material and/or moral benefits. If a gift, donation, aid or invitation cannot be accepted, the person should politely decline it and mention this policy. If the gift is sent in advance, it should be returned.

2. Grants and Donations

While conducting its activities, Şimşek Ambalaj may plan grants or donations for social responsibility and beneficial purposes. Such benefits can only be made through the marketing activities carried out by the company as a corporate entity and senior management approval is required.

However, it is prohibited to provide or accept grants/donations to suppliers, customers and other third parties with whom Şimşek Ambalaj has commercial relations.

Supporting charities by company's employees independent from their work and donating moneys in amounts they have collected by themselves are excluded from this policy.

3. Third Party Relationships

A representative, consultant or other third party acting on behalf of Şimşek Ambalaj must act under all circumstances in accordance with this Policy. Contracts made with third parties must be arranged in accordance with all applicable anti-bribery and anti-corruption laws. No business relationship should be established with third parties who have any influence on public officials or who are thought to be able to influence public officials without a detailed examination of their background, qualifications and reputation made in representation of Şimşek Ambalaj.

Our employees are prohibited to enter into any personal debt/credit relationship with any third party that has commercial relations with Şimşek Ambalaj.

4. Relations with Public Officials

Any activity that Şimşek Ambalaj may conduct in connection with public officials or persons associated with them may pose both reputational risk and risk regarding compliance with applicable laws and regulations. Offering, promising or giving gifts, entertainment, hospitality or any other benefit to any official authorities or public officials, directly or indirectly, is impermissible.

5. Job Offers

During the recruitment process or temporary positions or assignments, improperly influencing the process is considered as bribery and corruption activity.

In order to avoid the impressions of such activities; a person known to have any relationship with a customer, business partner or third party or any public official may be hired or assigned to serve legitimate commercial purposes provided that there is no expectation from Şimşek Ambalaj to obtain commercial advantage from the public, that the person meets the necessary criteria for the relevant position and that it is compatible with the person's professional qualifications.

6. Debt/Credit Relationships Within the Institution

Establishing a debt/credit relationship among Şimşek Ambalaj employees is prohibited by intra-company regulations and procedures.

7. Political Activities

Şimşek Ambalaj does not provide any financial support to the campaigns of political candidates or other political activities. Employees cannot engage in political activities and propaganda in their workplaces and cannot use company resources for political purposes.

8. Policy Violations and Sanctions

In case of policy violation, the relevant persons must report the situation to the Human Resources Manager. Upon notification, Şimşek Ambalaj's Board of Directors investigates the violations and applies the necessary sanctions. Employees who report bribery or corruption cannot be subjected to retaliation or mistreatment.