

		<b>BRIBERY AND ANTI-CORRUPTION POLICY</b>			
Doküman No: EEK.02	Yayın Tarihi: 02.08.2016	Revizyon Tarihi: 24.05.2022	Revizyon No: 04	Sayfa No: 1 / 4	

## 1. OBJECTIVE

Bribery and Anti-Corruption Policy ("Policy") aims to disclose the policies of Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. for Bribery and the anti-corruption.

## 2. CONTENT

Bribery and anti-corruption policy involves;

- Employees of Efes Havlu Tekstil Sanayi ve Ticaret A.Ş including the board of Directors
- The companies which we receive goods and services and their employees, suppliers, subcontractors, consultants, lawyers, external auditors including individuals and organizations (partners) who act on behalf of Efes Havlu Tekstil Sanayi ve Ticaret A.Ş

## 3. DEFINITIONS:

Corruption is any kind of abuse of to the current position is due to be authorized by directly or indirectly, in order to profit.

Bribery is person's act with the task of performing related work to do, to make, to do, speed up, slow down in order to directly or through intermediary, benefits provided, offered or promised to be; demand or acceptance; to behave in ways contrary to his duties as the intermediary in the framework of these agreements it has concluded with another person that he or the requesting party or another benefit is that due to this relationship.

Bribery and corruption carried out in many different ways, such as

- Cash payments
- Political or other donations
- Commission
- Gifts, entertainment
- Other benefits

## 4. DUTIES AND RESPONSIBILITIES

The Board of Directors is responsible and authorized for implementation and updating of Anticorruption and bribery policy. In this context;

- The Board of Directors should establish ethical, reliable, and controlled working environment in accordance with the law,
- The Board of Directors should monitor whether the authorities of all departments, in their fields, accomplish the activities of with the safe and legal regulations
- In the event of non-compliance with rules and regulations , the Board of directors is responsible with notification, investigation, and determination of enforcement mechanisms and management.

In addition, Efes Havlu Tekstil Sanayi ve Ticaret AŞ employees are responsible for,

- Ensuring compliance with policies determined by the Board of Directors.
- Working according to relevant law and regulations of Efes Havlu Tekstil Sanayi ve Ticaret AŞ
- Reporting to Board of Directors in the case any behavior, action or activity which are against the Policy

		<b>BRIBERY AND ANTI-CORRUPTION POLICY</b>			
Doküman No: EEK.02	Yayın Tarihi: 02.08.2016	Revizyon Tarihi: 24.05.2022	Revizyon No: 04	Sayfa No: 2 / 4	

## 5. SUPPLIERS AND PARTNERS

Suppliers and Partners are required to ensure compliance with relevant statutory regulations and policy guidelines other individuals and organizations that do not meet these studies are terminated

### 5.1 SELECTIONS OF THE COMPANIES AND THE PARTNERS

During the selection phase of suppliers, business partners and subcontractors; criteria such as experience, financial performance, technical competence, their ethical levels and also having a positive history in this field are taken into account by the senior management. The company does not work with the suppliers or business partners with the negative information about bribery and corruption even they meet the other criteria. In this context, the necessary research and evaluations to be performed before entering into any business relationship is primarily the responsibility of senior management.

### 5.2 PROVISION AGREEMENT WITH THE COMPANY AND PARTNERS

In the contracts to be made with the partners and the companies and which has positive history and meet the criteria;

- Ensuring full compliance with full compliance with the principles stated in the policy and other relevant regulations
- Employees absorb these principles and act accordingly,
- Ensuring employees receive training about the policy in certain periods are mentioned. Failure to do so or in the event of a violation of state policy, the work and shall include the provisions requiring termination of contracts in force right reason.

## 6. POLICIES AND PROCEDURES

### 6.1 BRIBERY AND CORRUPTION

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. is against all kinds of bribery and corruption. Whatever the purpose is, it is absolutely unacceptable to receive or give bribes Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. should not continue with business relationships with third parties who wish to do business through bribery and corruption

### 6.2 GIFTS

Gift is an item which does not require payment and is given by business contacts and customers to thank or commercial courtesy by Efes Havlu Tekstil Sanayi ve Ticaret A.Ş to be given to third parties by any kind of gifts must be given publicly ,unconditionally and in good faith In this context, the gifts and the rules for recording them have been written in the Gift Acceptance and Giving Policy.

The same principles are also valid for the acceptance of the gift, and it is absolutely not to be accepted as a gift except for the symbolic gifts, which are not high in material value and are included in these principles. In addition, even if it is within this scope, it is required that the acceptance of gifts should not be incurred, the person responsible for the accepted gifts

		<b>BRIBERY AND ANTI-CORRUPTION POLICY</b>			
Doküman No: EEK.02	Yayın Tarihi: 02.08.2016	Revizyon Tarihi: 24.05.2022	Revizyon No: 04	Sayfa No: 3 / 4	

should be notified to the responsible department of the company's Human Resources Department or the General Manager through the supervisor.

Even if it complies with the policies mentioned in the policy, it may cause conflict of interest, or it should not cause situations which can be perceived when it is heard in the public, in such cases a gift should not be offered or accepted.

### 6.3 HOSPITALITY POLICY

The application of the principles of the policy of giving and accepting gifts of 3.in the context of the item is evaluated. Senior management is consulted in cases of doubt.

### 6.4 FACILITATION PAYMENTS

People and organizations within the scope of this Political Policy can not offer facilitation payments to government agencies in order to secure or accelerate routine operations or processes (obtaining permits and licenses, obtaining documents, etc.)

### 7. ACCURATE RECORD-KEEPING

Accounting and recording system of Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. is regulated by legal obligations with enforced regulations. According to this;

- All accounts, invoices and documents belonging to third parties (customers, suppliers,etc.) shall be recorded and maintained in a reliable, complete, accurate and accurate manner
- There should be no falsification of accounting records or commercial records which are similar to accounting for any transaction and the facts should not be diverted

### 8. EDUCATION AND COMMUNICATION

Trainings are an important instrument for raising employees' awareness. In this context, the Human Resources Officer designs training programs in which employee participation is mandatory.

How these trainings are to be done and how to evaluate them is explained in the 'Training Procedure' and the necessary records are kept and secured.

### 9. NOTIFICATION OF POLICY VIOLATIONS

If an employee or a person acting on behalf of Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. is in the opinion or suspicion that it acts against the policy, administration of Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. should be informed about the subject Efes Havlu Tekstil Sanayi ve Ticaret A.Ş encourages an honest and transparent approach; in good faith, any employee who expresses his or her internal concerns or who acts on behalf of Efes Havlu Tekstil Sanayi ve Ticaret A.Ş, and keeps the declaration confidential. No employee shall be subject to pressure or punishment for his / her belief that there is a violation, and no changes may be made in the scope of the duty or on-site for such reason without the written approval of the General Manager.

If the person making the notification is exposed to such treatment, he or she must report it directly to the General Manager.

		<b>BRIBERY AND ANTI-CORRUPTION POLICY</b>				
Doküman No: EEK.02	Yayın Tarihi: 02.08.2016	Revizyon Tarihi: 24.05.2022	Revizyon No: 04	Sayfa No: 4 / 4		

It is expected that companies and business partners which Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. receives goods and services; make regular reminders to their employees about the bribery and the anti-corruption policy of Efes Havlu Tekstil Sanayi ve Ticaret A.Ş and encourages them to notify in case of such situations. This is also guaranteed by contracts.

## 10. POLICY VIOLATIONS

In situations that are or may be contrary to the policy, the matter is examined by the Board of Directors and necessary sanctions are applied in case of detection of inappropriate behavior.

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. agrees that the agreements made with the companies which are bought and sold goods and services or the persons and organizations acting on behalf of Efes Towel Textile Industry and Trade, are in contradiction with the policy or in case of determination of attitude or activity. Provisions for unilaterally termination by just cause shall be included and in case of Policy violation these provisions shall apply without exception.

## 11. EFFECTIVE

This policy has been put into practice with the decision no. EEK.02 dated 02.08.2016 of Efes Tekstil Sanayi ve Ticaret A.Ş Board of Directors and it is the responsibility of the Board of Directors to be implemented.

**GENERAL MANAGER**