



# Anti-Bribery Policy





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# Anti-Bribery Policy

The purpose of Saya Holding's Anti-Bribery Policy is to ensure that all activities carried out within Saya Holding and its companies are conducted in an ethical and lawful manner, free from bribery. It aims to define the principles and fundamentals to protect our reliability and reputation towards our stakeholders.

Bribery is the act of providing benefits to someone through an agreement with a third party so that they act contrary to their duties by performing, not performing, accelerating, or slowing down an action. Bribery can take many different forms and occur in various areas, such as cash payments, gifts & hospitality, social assistance, donations and sponsorships, facilitation payments, etc.

We adopt the fundamental principle of conducting all our activities in line with our value of "Reliability," adhering to the highest ethical standards. In this respect, as a signatory of the United Nations Global Compact, we are committed to all its principles, including Principle 10: "Businesses should work against corruption in all its forms, including extortion and bribery."

- **Zero Tolerance:** We adopt a zero-tolerance policy towards bribery.
- **Compliance and Adherence to Laws:** All our employees are obligated to comply with laws related to bribery and corruption.
- **Transparency:** All transactions must be transparent and auditable.
- **Ethical Conduct:** We maintain high ethical standards in our business relations.

## 1 – Scope & Responsibilities

- This policy applies to all Saya Holding employees, external service providers, consultants, external auditors, and business partners.
- Our employees accept the "Anti-Bribery Policy" and act in accordance with the principles stated in the policy document.
- Members of the board of directors and all employees receive regular training on anti-bribery policies and procedures.
- Our managers ensure that the principles in this policy are understood, implemented, and maintained by their business partners and employees under their supervision.
- Under no circumstances can employees be forced by anyone to act contrary to this policy.

Our organization regularly assesses bribery risks and identifies activities with high risks.

- Our institution regularly assesses bribery risks and identifies high-risk activities.

An Ethics Committee has been established to ensure compliance with ethical rules, promote an ethical culture throughout the community, and increase awareness and consciousness on these matters. The Ethics Committee works to solve problems encountered during the implementation of the Anti-Bribery Policy, make decisions, and provide opinions.

Additionally, internal control systems have been established in accordance with anti-bribery and ethical principles, and an Ethics Hotline has been created to support compliance. Reported or suspected bribery cases are meticulously examined and investigated within the framework of determined procedures.

The number of detected bribery incidents, their details, and the disciplinary measures taken in response to these incidents are regularly monitored and reported transparently. Our anti-bribery policies are regularly reviewed and updated when necessary. These processes are carried out according to changing legal regulations and organizational needs.

## **2 - Provisions on Receiving/Giving Gifts and Hospitality**

- It is unacceptable to receive or request gifts and hospitality that could influence or are intended to influence the decisions and preferences of the company or its employees. Likewise, gifts that may influence the decisions of the other party are not given.
- In our relationships with customers and suppliers, we prioritize transparency and honesty. Within this framework, we accept business meetings and social activity invitations that are not contrary to our company policies and interests and are reasonable in scope.
- Gifts not exceeding one-fourth of the gross minimum wage within a calendar year and items bearing the employee's name (such as diaries, calendars, and pens) may be accepted with the knowledge of the manager. Gifts exceeding this amount must be delivered to the Human Resources Department. The gifts stored by Human Resources are reused as prizes for employees during events and activities organized for them.
- All our promotional and marketing activities for customers are planned within the framework of legal and ethical principles. In this planning, both the laws, regulations, guidelines, and rules of official authorities and sectoral organizations are considered. Our employees are expected to comply with these rules.
- While performing their duties, employees may not receive any bribes and/or commissions from any person or institution. If this rule is violated, the employee's employment contract is terminated.

### **3 - Provisions on Donations and Sponsorships**

Saya Holding and its companies cannot make direct or indirect donations, provide cash or in-kind assistance, or carry out support activities for political parties or political party members in exchange for any benefit. Likewise, grants, donations, or sponsorships that may fall into this category are not provided. No improper benefits that could constitute bribery are offered to public officials to gain unlawful advantages.

### **4 - Provisions on Facilitation Paymentst**

Saya Holding and its companies do not make "facilitation payments" to any authority or supplier to accelerate, prioritize, or obtain different benefits in their business dealings. Similarly, they do not tolerate such payments by companies with which they have business relationships.

### **5- 5 - Provisions on Employment Benefits**

Saya Holding and its companies base their recruitment processes on merit and objective criteria. No benefits are provided in exchange for hiring the acquaintance or relative of any individual.