



ARSLAN ALÜMİNYUM ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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Purpose

The purpose of this policy is to prevent bribery and corruption across all activities of Arslan Alüminyum A.Ş., to reinforce ethical business practices, to raise awareness among employees regarding these matters, and to clearly define responsibilities for all relevant parties. This policy has been prepared in accordance with the company's ethical standards, sustainability targets, and national/international anti-corruption standards.

Scope

This policy encompasses the Board of Directors members, executives, employees, shareholders, suppliers, subcontractors, consultants, audit service providers of Arslan Alüminyum A.Ş., and all stakeholders engaged in commercial or social relationships with the company.

Responsibilities

- **Board of Directors:** Responsible for determining the strategic direction regarding anti-bribery and anti-corruption matters, overseeing the implementation of policy requirements, and providing the necessary organizational environment.
- **Senior Executives:** Responsible for ensuring the effectiveness of the policy implementation within their respective areas of responsibility and providing guidance to employees.
- **Employees:** Prohibited from offering or accepting bribes, engaging in corruption, or tolerating such behaviors. Obligated to immediately report any suspicious situations.
- **Ethics Committee:** Responsible for monitoring compliance with ethical principles, evaluating non-conformities/violations, and enforcing necessary sanctions.

Principles and Commitments

As Arslan Alüminyum A.Ş., we commit to the following principles:

- **Legal Compliance:** We commit to full compliance with all relevant legal regulations concerning bribery and corruption in all countries where we operate.
- **International Standards:** We strictly adhere to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.
- **Zero-Tolerance Approach:** We enforce a strict "zero-tolerance" policy against bribery and corruption.
- **Ethical Conduct:** We conduct all our transactions and operations in a fair, honest, transparent, legal, and ethical manner.
- **Accurate Record-Keeping:** Off-the-books transactions are strictly prohibited; all accounting and financial records must be maintained accurately, completely, and in a manner that reflects the true nature of transactions.
- **Non-Retaliation:** No employee who reports a suspected or actual incident of bribery or corruption in good faith shall be subjected to retaliation, discrimination, or mistreatment.

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Implementation

The effective execution of this policy is secured through the following processes:

1. Gifts and Benefits

- Employees cannot accept gifts, hospitality, or benefits from customers, suppliers, or third parties that possess the nature or intent to influence professional decisions.
- Inappropriate or non-compliant gifts are recorded into the company inventory and retained under corporate custody.

2. Donations and Charitable Contributions

- The company's donation and charitable contribution policy is published transparently for public access.
- All corporate donations are executed exclusively with the approval of the Board of Directors and are reported to shareholders during the General Assembly meetings.

3. Political Activities

- The company does not provide financial or material support to political parties, candidates, or political events.
- Employees are prohibited from engaging in political propaganda within the workplace and cannot utilize company resources or assets for political purposes.
- 4. Representation and Hospitality
- Arslan Alüminyum engages in representation, business entertainment, and hospitality activities only within reasonable and legitimate limits solely for the purpose of developing professional business relationships.

5. Supply Chain

- Business partners and suppliers are systematically evaluated in terms of their compliance with anti-bribery and anti-corruption principles.
- Commercial entities identified to have been involved in bribery or corruption activities are immediately placed on the blacklisted vendor list.

Monitoring and Review

- Processes implemented within the scope of this policy are periodically reviewed and audited.
- Policy effectiveness is evaluated systematically through internal audits, ethics committee investigations, and employee notifications.
- Risks related to bribery or corruption are regularly analyzed, and preventive measures are updated accordingly.
- In the event of a policy breach, the matter is rigorously investigated by the General Manager and the Ethics Committee, and necessary disciplinary actions or legal sanctions are enforced.

Effective and Review Dates

Effective Date: 12.02.2026

Review Date: 12.02.2027

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