



## ANTI-BRIBERY AND CORRUPTION POLICY

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### REVİZYON BİLGİLERİ

REVİZYON TARİHİ	REVİZYON NO	AÇIKLAMA
16.01.2024	00	İLK YAYIN

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### Purpose

This Anti-Bribery and Corruption Policy has been developed in accordance with Arslan Alüminyum's ethical standards and sustainability objectives. It aims to prevent bribery and corruption in all its operations, raise awareness on these issues, define responsibilities and rules, and share this information with all relevant parties.

### Scope

This policy applies to Arslan Alüminyum's Board of Directors, senior management, all employees, shareholders, subcontractors, suppliers, consulting and auditing firms, and all stakeholders who have business or social relationships with Arslan Alüminyum. Additionally, all subsidiaries, joint ventures, and business partnerships where Arslan Alüminyum holds more than 49% shares are subject to this policy.

### Definitions and Abbreviations

- **Arslan Alüminyum:** Arslan Alüminyum Anonim Şirketi.
- **Donation and Aid Policy:** The policy regulating the donations and aids that Arslan Alüminyum may make under certain conditions.
- **Gifts:** Items with no material value given by business partners or customers as a token of thanks or commercial courtesy.
- **Policy:** Arslan Alüminyum Anti-Bribery and Corruption Policy.
- **Bribery:** Material or non-material benefits provided to third parties to influence a person's decisions and actions.
- **Representation and Hospitality:** Activities such as social events, accommodation, meal invitations, training, and conferences.
- **Corruption:** The abuse of entrusted power for personal gain by a person for themselves or others.

### Fundamental Principles

Arslan Alüminyum is committed to complying with anti-bribery and corruption laws in all countries where it operates and adheres to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. The company follows a zero-tolerance policy against bribery and corruption and conducts all its activities fairly, honestly, and in compliance with legal and ethical standards.

### Gifts and Benefits

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Arslan Alüminyum employees cannot accept gifts from customers, suppliers, or third parties that could influence the company's preferences and decisions. Unacceptable gifts are recorded in the company inventory and stored.

### Donations and Aid

Arslan Alüminyum's Donation and Aid Policy is publicly available on the company's website. Donations are made with the approval of the Board of Directors and reported to shareholders at the General Assembly meetings.

### Political Activities

Arslan Alüminyum does not provide financial support to political candidates' campaigns or other political activities. Employees cannot engage in political activities or propaganda at the workplace or use company resources for political purposes.

### Record Keeping

Arslan Alüminyum records all accounts, invoices, and documents completely, transparently, accurately, and reliably. Necessary control systems have been established to prevent off-the-record transactions.

### Representation and Hospitality

Arslan Alüminyum engages in representation and hospitality activities within reasonable limits to foster business relationships.

### Duties and Responsibilities

- **Board of Directors:** Responsible for anti-bribery and corruption activities and ensuring the necessary environment is provided.
- **Managers and Employees:** Cannot offer or accept bribes and cannot engage in corruption. Senior managers are responsible for ensuring compliance with this policy.
- **Ethics Committee:** Responsible for the implementation and improvement of ethical principles.

### Supply Chain

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Arslan Alüminyum selects and evaluates the organizations it contracts with to ensure they do not work with individuals with negative records related to bribery or corruption. Companies found to have engaged in bid-rigging are placed on the prohibited companies list.

### Policy Violations and Sanctions

In the event of a policy violation, relevant individuals must report the situation to the General Manager. The Disciplinary Committee or Ethics Committee reviews the violations and applies necessary sanctions. Employees who report incidents of bribery or corruption cannot be retaliated against or treated unfairly.

### Announcement and Enforcement

This policy has been prepared in both Turkish and English and is publicly available on Arslan Alüminyum's website. The policy has been approved by the Board of Directors and has been put into effect.

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