

Issued Date / Hazırlık Tarihi:	3.11.2025
Revision Date / Revizyon Tarihi:	-
Revision No / Revizyon No:	0
Confidentiality level / Gizlilik Seviyesi:	L2
Document No/Dokuman No	POL.20

1. OVERVIEW, PURPOSE AND SCOPE

We, Martur Fompak International, conduct business in an honest and ethical manner and have zero tolerance policy with regard to bribery and corruption in all of our relationships and business dealings, where we operate. With this Policy, we aim to declare our commitment to prohibit bribery, corruption and to be in compliance with applicable laws and guide for identifying and avoiding potential bribery, corruption and actions to preserve our integrity and reputation. Therefore, we expect all our employees, including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners, such as customers, suppliers, contractors, and consultants, to comply with and act in line with this Policy and to always do business in accordance with our Global Code of Conduct.

2. DEFINITIONS

Bribery refers to an action to solicit, offer, promise, give, ratify, receive or accept gifts, presents or other advantages “anything of value” with the aim to **corruptly influence** (*Corruptly influence means an intent or desire to wrongfully influence and induce the recipient’s misuse of his/her position*) or obtain **improper advantage** (*Improper advantage means an advantage to which our company and/or its Business Partners are not explicitly entitled*) over a business transaction or relationship.

Bribery also involves, (i) distribution of a certain amount of a contractual payment to government or party authorities or personel, relatives, friends or business partners of the other contracting party; or (ii) using intermediaries such as agencies, subcontractors, consultants or other third parties for the transfer of these contractual payments to the government or party authorities or personel, relatives, friends or business partners of the other contracting party.

Business Courtesy refers to any kind of gift or hospitality (including but not limited to meal, travel or hospitality) provided for a business purpose or associated with a business event or/and for business opportunity.

Business Partners refers to any real or legal persons with which a business opportunity arises, exists or relationship is established including but not limited to customers, suppliers, contractors and consultants etc.

Charitable Contributions refer to voluntary contributions to any organization, either in kind or in cash without expecting any benefit.

Facilitation Payment refers to an unofficial, improper, small payment made to secure or accelerate the legitimate operation of the paying party, in order to expedite a routine service.

Sponsorship refers to any action which is to make any cash or non-cash payment for the activities that are organized by an individual, professional organization or entity with an expectation that it will provide benefit for our company .

The UN Global Compact refers to a global pact initiated by the United Nations (UN) to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation.

Public Official refers to a variety of individuals, including but not limited to the (i) employees working at governmental bodies, governmental business enterprises; (ii) employees of political parties, political candidates; (iii) any person holding a legislative, administrative or judicial position of any kind, whether appointed or elected; (iv) any person who exercise a public function; (v) officials or representatives working at international or supranational organizations that have been established based on an international agreement.

Forms of Value refer to actions that run the risk of being perceived as potentially providing improper benefits such as;

- Gifts, Hospitality
- Hiring Family Members of Public Officials
- Donations, sponsorships and other Types of Value – (Tickets for sports activities, rebates, samples, free goods, and other trade and merchandising programs.)

Gift refers to any item of value offered or received directly or indirectly, including cash, physical goods, gift cards, discounts, services, favors, rewards, promise of employment, promotions, memberships, any other tangible or intangible item.

Politically Exposed Persons refers to individuals who are or have been entrusted with prominent public functions, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials, senior management of the international organizations, and family members and close associates of such persons.

3. GENERAL PRINCIPLES

Our company is a signatory party to the UN Global Compact, by which it is aimed to work against all forms of malpractices such as bribery and corruption all over the world. Within this view, we do not permit or accept the bribery in any form. Independent from local practices or regulations, we do not tolerate any kind of bribes, corrupt payments, facilitation payments, or inappropriate gifts and entertainment to anyone involved in our business cycle.

We act in compliance with all applicable anti-bribery laws, including the United Nations Convention Against Corruption (“UNCAC”), U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act (“UKBA”), and the local laws in every country in which we operate.

We conduct trainings on bribery and corruption to our employees and we monitor their completion without delay. Incompliant actions might cause us to be punished through several measures including but not limited to the followings: invalidation of the licenses granted by the public authorities; seizure of the goods which are used in the commitment of, or the result of, a crime by the representatives of a legal entity; administrative and/or penal sanctions on our employees and seizure of financial benefits arising from or provided for the commitment of a crime, and most importantly, exposes us to significant reputational harm.

4. COMMITMENTS

4.1 Hospitality, Meals, Travel and Gifts

Gifts are generally given by Business Partners or any person with which a business relationship is established as a means of thanking or Business Courtesy and which does not require a financial payment.

Providing or accepting gifts, meals, travels, or entertainment to effect any party inappropriately, including but not limited to a Public Official, in exchange for any improper benefit is strictly prohibited. In some certain circumstances, giving or receiving meals, small company events and tickets to sports and cultural events may be considered acceptable if they occur occasionally and do not exceed a certain amount per thresholds as per Gifts&Hospitality Policy

All kinds of gifts offered or given to third persons by the company must be offered in public, with good faith and unconditionally. The same principles apply for accepting a gift and no gift must be certainly accepted apart from the symbolic gifts included in these principles, with low financial value. Gifts & Hospitality Policy shall be applied regarding receiving and giving any kinds of gifts.

4.2 Hiring or Engaging Public Officials and/or Politically Exposed Persons

Hiring decisions must be based on virtue and this should not inappropriately influence Public Officials and Politically Exposed Persons. There must be approval from Legal and Compliance Team before proceeding with the recruiting process, if a known family member or designee of a Public Official and Politically Exposed Person is seeking employment at our company.

Public Officials and Politically Exposed Persons can be hired or engaged to perform services that have a legitimate business purpose by us, provided that:

- There is no expectation that the person is being retained by us in exchange for any improper action or business advantage from the government,
- Such person is objectively qualified enough in terms of the criteria required for the related position,
- The salary or fees are reasonable and consistent with the work and the related person’s professional qualifications,

4.3 Grants, Donations and Sponsoring

Providing a grant, donation and/or sponsorship to improperly effect a Public Official, or in return of any improper favor is prohibited by this Policy. Providing a donation to any political party on behalf of our company or under any other name, in kind, or in cash is prohibited. Donations and Sponsorships can only be made in line with the rules and principles set forth in the Social Responsibility Policy.

4.4 Facilitation Payments

Facilitation payments are usually small, unofficial or covert payments which are sought in order to do a job properly or more quickly or for preferential treatment, usually things you are already entitled to. Facilitation payments are prohibited by this Policy.

4.5 Third Party Relationships

Applicable laws regarding bribery and corruption do not permit any kind of improper payments made directly by Company employees or indirectly through an agent, consultant, distributor, or any other third-party representative acting for or on behalf of our company (collectively, “Third Parties”).

Third Parties must be in accordance with this Policy, at all times. To mitigate the risk of bribery and corruption, a risk-based due diligence on third parties must be conducted, both before and throughout the business relationship. The risk based due diligence on prospective Business Partners, joint venture partners, acquisition targets, and other strategic investments must be conducted to mitigate corruption related risks. We must engage third Parties only if;

- a legitimate business need is in place for the services or the goods provided,
- the price of the services and goods are not above market value,
- the Third Party is evaluated as appropriate after application of due diligence process from an anti-bribery and corruption perspective.

No relationship should be established with a Third Party who has or will have a substantive interaction with Public Officials on behalf of our company without an inquiry into the Third Party’s background, qualifications and reputation.

4.6 Transparency and Accuracy of the Books and Records

The failure to keep accurate and transparent books and financial records might breach local laws even when no bribery action is in place. Thus, for each transaction, principles regarding internal controls, financial reporting and document retention should be taken into consideration, and it should be ensured that we demonstrate its compliance with anti-bribery laws and regulations.

All kinds of accounts, invoices and other documents created from dealing with Business Partners should be recorded to the books, timely and accurately, including clear explanations so that a third party reviewer can be able to understand the business rationale behind the transactions.

Any alteration falsifying the nature of any transaction is prohibited on accounting or similar commercial records.

5. AUTHORITY AND RESPONSIBILITIES

All our employees, including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners are expected to align with and actively support these principles. In addition, all individuals who experience or witness any conduct they believe to be in conflict with this Policy, should report with assurance of confidentiality and protection from retaliation as outlined in our Whistleblowing Policy.

6. VIOLATIONS AND CONSEQUENCES

By this Policy, we actively prevent and prohibit such aforementioned or similar conduct. Our zero-tolerance principle means; if such a conduct does occur, we will look into and review every allegation of violation, initiate appropriate action in response. If there is a discrepancy between the local regulations, applicable in the countries where our company operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersedes. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by Business Partners or any third parties, their contracts may be terminated. This Policy will be periodically reviewed by the Legal and Compliance Team to ensure compliance with new or revised laws and regulations.