

	GIFTS AND HOSPITALITY POLICY	Issued Date / Hazırlık Tarihi:	16.09.2026
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1.OVERVIEW, PURPOSE AND SCOPE

At Martur Fompak International, our relationships with our Business Partners such as customers, suppliers, contractors, and consultants are fundamental to our continued success. To preserve the integrity, transparency, and objectivity of these relationships, we avoid conflicts of interest and take great care when offering or accepting gifts or hospitality. Particular caution must be exercised when dealing with public officials, government representatives, or state-owned entities, as even the appearance of impropriety can carry significant legal and reputational risks.

This Policy outlines the principles and expectations for giving and receiving of gifts and hospitality on behalf of Martur Fompak International. It aims to prevent conflicts of interest and, ensure all related parties act with integrity and uphold our ethical standards.

This policy applies globally to 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.

2.DEFINITIONS

Gift: 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.

Hospitality: Meals, beverages, accommodation, transportation, travel expenses, event tickets, utilization of vehicles or recreational facilities, or entertainment provided as part of a business relationship.

For the undefined terms used in this Policy, please refer to our POL.20. Anti Bribery and Corruption Policy and POL.17. Conflict of Interest Policy.

3. GENERAL PRINCIPLES

The exchange of modest business gifts and hospitality can be a legitimate way to foster goodwill and strengthen professional relationships. However, such gestures must always be lawful, appropriate in context, and never intended to influence business or governmental decisions improperly.

As a global organization operating across diverse cultural settings, we respect local customs and traditions. Nevertheless, all actions must comply with applicable local laws and align with the standards set forth in this Policy.

- We do not offer or accept gifts or hospitality to gain an improper advantage or influence decisions unfairly.
- All gifts and hospitality must be customary, reasonable in value, occasional, and proportionate to the business relationship.
- Such gestures must not create actual or perceived conflicts of interest.
- We fully comply with all relevant anti-bribery and anti-corruption laws, as well as our internal policies—regardless of local practices.
- Extra caution must be exercised when dealing with public officials or government representatives, as stricter rules often apply.
- It is strictly prohibited to request, solicit, or imply an expectation of gifts or hospitality from suppliers, customers, or business partners.

4. APPLICATION OF THE POLICY

4.1. Gifts:

All gifts must be offered or accepted transparently and in accordance with the general principles of this Policy.

Promotional items such as pens, calendars, or similar merchandise bearing the name, logo, or brand of the offering organization, that are not personally requested and are unlikely to influence business decisions may be accepted. Modest food items, refreshments, or other customary tokens of appreciation intended for sharing with a team or group may also be accepted.

For the avoidance of doubt; we do not offer or accept gifts in the form of :

- **Cash or cash equivalents** such as gift cards, shopping vouchers, checks, or loans.
- **Non-cash benefits** including discounts, services, memberships, employment opportunities, or promotions.

These forms of gifts may create a conflict of interest and can unduly influence business decisions.

In cultural contexts where refusing any gift outside this scope may cause offense, the gift must be promptly reported to the Legal & Compliance Team via Ethics Hotline . Where appropriate, it may be donated to charity or shared within the company in a transparent manner as per Legal & Compliance Department's decision.

4.2. Hospitality

Hospitality—such as business meals, travel, or accommodation—may be offered or accepted as part of a legitimate business relationship, provided it is modest, infrequent, and appropriate to the context. All hospitality must be conducted transparently, in line with the general principles outlined in this Policy. It must be based on a clear business purpose, never used to improperly influence decisions or gain unfair advantage, and must not create a sense of obligation or perceived preferential treatment.

The cost of business meals must not exceed EUR 100 per person, or the equivalent in local currency. Employees intending to host a business meal for an external party must first obtain approval from the director-level management of their function. Where the cost of meal hospitality exceeds EUR 100 per person, prior approval from the Board of Directors is required.

Any hospitality involving government officials requires prior notification to the Legal and Compliance Group Directorate.
(legal.compliance@marturfompak.com).

In addition, employees are expected to be aware of the organizational rules and standards of those to whom the employee intends to provide a gift or hospitality.

All travel and accommodation arrangements must be made in accordance with **POL.11 Sustainable Business Travel Policy**. Hospitality expenses must be accurately recorded through the internal Expense Management System and supported by relevant documentation, including the attending parties, a description of the business relationship, event details, and receipts where applicable.

It is strictly prohibited to request gifts or hospitality from any supplier, vendor, customer, or other business partner. This prohibition includes not only direct requests but also any suggestion, implication, or behavior that may signal such gestures are expected, encouraged, or welcomed in exchange for business advantage.

In case of doubt, any question should be escalated to the Legal & Compliance Team via Ethics Hotline to to ensure transparency in our actions.

5. AUTHORITY AND RESPONSIBILITIES

All our employees, including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners 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. In addition, they are expected to demonstrate alignment with these principles by promoting ethical conduct and ensuring that all related parties act with integrity.

6.VIOLATION 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, take appropriate action in order to maintain integrity which is a prerequisite. 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.