

The objective of the Şişecam Group Competition Policy is to illustrate the Group's commitment to relevant legislation and obligations concerning protection of competition; to encourage and ensure that Group employees comply with competition rules by raising their awareness; and to contribute to the establishment of an effective and fair competitive environment in the countries and sectors where it operates.

Şişecam Group is not entitled to be a party to any (whether formal or informal, written or oral, explicit or implicit) agreement, practice, decision, or merger/acquisition that is intended to or may have the effect of preventing, distorting, or restricting competition. Şişecam Group operates with the understanding that full compliance with competition law rules is a fundamental part of the responsibilities and work of all Group employees.

Şişecam Group avoids any sort of unlawful anti-competitive practices with its competitors and other parties that may be in a competing position in a specific business, especially in the following matters:

- fixing or controlling purchase and sale prices, or price elements,
- making commitments for non-competition,
- allocating customers, products, or territories,
- boycotting certain customers, suppliers, or intermediaries,
- concluding collusive agreements with competitors, directly or indirectly, in tender processes,

etc., and exercises due diligence to avoid disclosing competition-sensitive information through all kinds of communication with third parties.

In its agreements with customers, suppliers, and intermediaries, Şişecam Group avoids practices that could indirectly or directly involve unlawful restriction of competition, such as:

- restricting the freedom to set prices,
- making the sale of one product or service conditional upon the purchase of another product or service,
- entering into exclusivity or non-competition agreements,
- allocating or directing customers, products, or territories.

Şişecam Group operates with the understanding that it may hold a dominant position in the markets in which it operates, and avoids practices that could lead to abuse of this dominant position, such as:

- preventing entry into these markets,
- refusing to enter into a business relationship and provide goods without a valid reason,
- coercing or inducing its customers or suppliers to do business (e.g., inducement through exclusivity clauses, loyalty discounts, or discount systems),
- conditioning the sale of certain products/services upon the purchase of another product/service,

- discriminating between customers or suppliers of the same type, setting prices too high or below cost, or demanding excessively low purchase prices.

Group employees conduct their activities within the framework of the Şişecam Group Competition Policy and the guiding documents prepared by the Legal Department. In the event that Group Employees are uncertain whether they are violating regulations on the protection of competition in their relations with competitors, business partners, and customers, and in the tasks they undertake under the umbrella of an association of undertakings, they are required to consult with the Legal Department.

The Legal Department is responsible for keeping this policy updated, conducting the competition law compliance program within Şişecam Group, following the latest developments in this field, preparing guidelines and manuals, and conducting training, inspection/surveillance, and awareness activities for Group employees.