



ŞİŞECAM GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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1. PURPOSE

The purpose of this policy is to set out commitments and position of Şişecam Group clearly with regard to bribery and corruption and uphold the corporate image and reputation. This policy, being an integrated part of the Şişecam Group Code of Conduct, aims to provide necessary information for the prevention of bribery and corruption in all Group activities and to specify responsibilities and rules.

2. SCOPE

The Anti-Bribery and Anti-Corruption Policy covers not only Group employees but also all business partners acting in the name of the Group or offering services to the Group.

Accordingly, this policy covers:

- All Group employees including members of the Board of Directors,
- Third party consultancy, legal consultancy, or counselling companies and their employees,
- Outsourcing suppliers, sub-contractor companies and employees,
- Persons and entities undertaking activities in the name of the Group directly or indirectly including but not limited to representatives, distributors, and agencies.

3. DEFINITIONS

Conflict of Interest: Any non-pecuniary or material benefit owned that may prevent the employees from fulfilling their duties within their responsibilities impartially or may create a perception in that respect,

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Turkey/0800 621 2393, Austria/0800 017855, Bosnia & Herzegovina/080 083 067, Bulgaria/0800 46 269 China/400 120 0275, Egypt/0800 006 0316, Georgia/0800 10 02 50, Germany/0800 180 0655, Hungary/80 088 538, India/000 800 919 0261, Italy/800 828 488, Netherlands/0800 022 2904, Romania/0800 360 147, Russia/8 800 301 85 34, Slovakia/0800 601 478, Spain/900 876 290, Ukraine/0800 801 480, USA/1 800 508 1753

Ethics Board: The Ethics Board which was established in accordance with the Şişecam Group Ethics Board Regulation and operates reporting to the Corporate Governance Committee,

CEO: The CEO of Şişecam,

Internal Regulations: Policies, regulations, procedures, and similar documents approved at the level of the Board of Directors and the CEO,

Code of Conduct: The code of business ethics set forth in the appendix of the Şişecam Group Ethics Board Regulation,

Company or Şişecam: Türkiye Şişe ve Cam Fabrikaları A.Ş.,

Group Employee: All monthly and hourly paid employees of the Group companies,

Group: Türkiye Şişe ve Cam Fabrikaları A.Ş. and all subsidiaries,



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Bribery: Acquiring a material or immaterial advantage, by offering directly or indirectly to a person or a third party designated by that person, pursuant to an oral or written agreement, to induce that person to take an action that is contrary to requirements of his business tasks or outside the ordinary course of business by means of performing, not performing, accelerating, or slowing down a specific task,

Corruption: Requesting, offering, giving, or receiving direct or indirect material or non-pecuniary benefit through failure to fulfil the duties being carried out in accordance with the law.

4. RESPONSIBILITIES

Board of Directors of Şişecam:

Şişecam Board of Directors shall be the highest authority responsible for the Anti-Bribery and Anti-Corruption Policy.

Accordingly, the implementation of this policy requires the following:

- The establishment of control mechanisms to prevent bribery and corruption,
- The establishment of communication channels required for reporting any conduct that is in violation of this policy and taking measures, to keep the confidentiality of the identity of reporting persons and their protections accordingly,
- Performing the necessary examinations and investigations regarding the complaints, notices and claims received on the subject within the framework of internal regulations,
- Conducting audits and taking regulatory measures to ensure compliance with legal regulations, policies, regulations, and procedures.

Ethics Board:

The Board is responsible for:

- Ensuring compliance with the matters stated in the Code of Conduct, disseminating a culture of ethics throughout the Group, and increasing awareness on this issue,
- Carrying out activities to resolve the matters stated in the Code of Conduct and the problems encountered during the implementation of this policy, making decisions and expressing opinions when necessary,
- Evaluating complaints and notices, regarding violations of the matters stated in the Code of Conduct, received by the Ethics Board either from internal or external sources through communication channels including but not limited to e-mail, mail, and telephone,
- Informing the Audit Committee, on cases specified in the Şişecam Group Ethics Board Regulation during the evaluation of complaints and notices received by the Ethics Board.

Group Employees and all business partners acting in the name of the Group or offering services to the Group:

Those that fall within the scope of the policy may not be forced to act in violation of this policy in any manner by any person.

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- All Group employees and business partners acting on behalf of the Group or providing services to the Group are responsible to accept the Şişecam Group Anti-Bribery and Anti-Corruption Policy and to act in compliance with the principles set forth in the policy.
- Managers are responsible for ensuring that the principles in this policy are understood, implemented, and maintained by their business partners and the employees under their management, and for reporting complaints, notices and claims received by employees under their management through the communication channels specified below.
- All Group employees must report any breach of this policy or suspicious acts to their managers and/or the Ethics Hotline.

5. FUNDAMENTAL PRINCIPLES

Given the fact that combating bribery and corruption constitutes an action requiring legal punishment in addition to its significance in terms of business ethics, employees, executives, and all relevant parties are expected to take this matter seriously and evaluate it as part of their personal duties and responsibilities independent of business life.

The Group adopts as a principle to act in compliance with anti-bribery and anti-corruption laws and regulations, universal rules of law, ethical and professional principles applicable in all countries where it operates or is represented. Accordingly, Şişecam Group adopts a **"zero tolerance"** approach to bribery and corruption and is committed to undertaking its activities fairly and honestly in line with legal and ethical rules.

The code of conduct, regulations, procedures, and other policies of the Group, supports the performance of activities correctly, fairly, and honestly in compliance with the laws, and the Group assumes an even more sensitive approach to anti-bribery and anti-corruption with a view to protecting the rights of all stakeholders.

The Group explicitly prohibits resort to bribery and corruption in its activities in all countries. Bribery may take various forms including cash, gift, entertainment invitation or ticket, debt relief, facilitation payment, charitable donations etc.

The Şişecam Group Anti-Bribery and Anti-Corruption Policy prohibits the following:

- Offering payment or anything of value to provide any unlawful or unethical benefit even for the interests of the Group, acquiring any similar benefit from other persons or entities,
- Any conduct in violation of the provisions set forth in the Şişecam Group Gifts and Hospitality Policy, inappropriately influencing any party, including public officials, giving or accepting gifts, meals, travel, tickets or hospitality for the purpose of obtaining an unfair benefit,
- Inappropriately prioritizing public figures and public officials, without considering competencies in recruitment decisions,
- Giving a donation, grant or sponsorship to a public official to inappropriately influence them or in exchange for an inappropriate benefit,
- Making or offering facilitation payments,



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- Using donations and aid in a manner that violates Group internal regulations and influence the other party,
- Using gifts to influence parties regarding any agreement to which the Group is a party,
- Inappropriate payments made directly by Group employees or indirectly through a consultant, supplier, distributor or other third-party representative acting on behalf of the Group,
- Using or promising authorities and responsibilities for personal and private benefit for one's self, one's family, or third parties,
- Giving political donations, using the means of the Group to support political candidates and entities,
- Any unlawful and unethical act that might be regarded as bribery or corruption, even if such practices are observed in the country of operation or in the industry.

In that regard, it is of no importance whether the benefit provided as bribery and corruption has any material value or whether anything is done for the other party in return for the benefit. Even when the value of the benefit is extremely insignificant or the commitment has not been realized despite making an offer, this shall be considered a violation of this policy hereby.

Şişecam Group is committed to protecting the legal rights of government institutions, suppliers, customers, employees, and other stakeholders.

Before a relationship is established with the third parties specified in this policy, an assessment should be made regarding bribery and corruption, and articles regarding this matter should be incorporated into the relevant agreements/contracts/memorandums. In the event that bribery and corruption allegations are proven to be true by judicial ruling about the person/entity with which the Group is in contact, the business partnership with the relevant person/entity shall be terminated.

Accounting procedures shall be recorded fully, correctly, and fairly and internal control systems are established for preventing undeclared transactions.

Trainings and informative activities on the relevant rules shall be carried out.

6. DETECTING OR SUSPECTING BRIBERY AND CORRUPTION

All Group employees shall be bound to inform their managers and/or the Ethics Hotline of any bribery and corruption event or suspicion immediately. Examples of these events are given below, and should any similar event be encountered, the relevant manager and/or Ethics Hotline must be notified:

- Offering a bribe to a person or a colleague,
- Witnessing or having knowledge of relationships based on mutual interest or conflicts of interest,
- Any irregularity in company records,
- Acts and conduct such as providing favor or benefit in tenders and purchases,
- Providing benefits to any customer or supplier in violation of internal rules or legal regulations,



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- Coercion applied on persons or colleagues by any internal or external person or entity to act in violation of the Şişecam Group Code of Conduct or this policy.

In exceptional cases where Group employees are unable to escape sudden threats to their lives, freedom or physical health due to a payment that may be considered a form of bribery or corruption, they should receive or make the relevant payment, but those involved must immediately notify their managers in the country where the incident has taken place and the CEO.

Upon witnessing incidents related to bribery and corruption, Group employees may hesitate to inform their managers or notify the Ethics Hotline, out of concern that they may also be harmed. The Board of Directors of Şişecam Group guarantees that persons, who report or file complaints about events in violation of legal regulations, the code of conduct, and internal rules, will not incur any damage for this reason.

The identities of these individuals shall be kept strictly confidential and any damage, arising from their complaints and reports, shall be prevented.

7. MATTERS REGARDING CONFLICTS OF INTEREST

All Group employees and other persons working for Şişecam Group must avoid personal activities and financial interests that may lead to a conflict with their responsibilities to the Group.

Employees are prohibited from obtaining personal benefits from persons and entities with whom they have business relations, either personally or through their families or relatives, by taking advantage of their current duties, and they are prohibited from attempting to acquire gains for themselves or others by abusing their positions.

Accordingly, the following are prohibited:

- Abusing one's position in the company to advance personal interests,
- Making any business contract without being certain that there is no conflict of interest,
- In the event of an emerging or potential conflict of interest, contributing to or participating in decision-making processes without the permission of the relevant manager,
- Entering a mutually or unilaterally beneficial business relationship with acquaintances with whom one has kinship or friendship ties, in a manner that is subject to the provisions of the Code of Conduct,
- Personal exploitation of or referral to business opportunities that may be in the interest of the Group.

Conflicts of interest must be reported to the manager immediately, and measures should be taken to eliminate the event in question.

8. MATTERS REGARDING DONATIONS AND GIFTS

Matters relating to donation and gift practices in the Group are regulated in detail in the Code of Conduct, the Şişecam Group Donation Regulation, the Şişecam Group Donation Policy, and the



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Şişecam Group Gift and Hospitality Policy. The Code of Conduct and the Şişecam Group Donation Policy are published on the corporate website to enable third parties including customers, suppliers, investors, and other stakeholders to have access to them.

In case of any uncertainty as to the interpretation or implementation of the regulations or coming across any situation not provided in the regulations, it is necessary to notify the Ethics Hotline.

9. SANCTIONS REGARDING WRONGFUL CONDUCT AND ATTITUDES

The Şişecam Group Anti-Bribery and Anti-Corruption Policy must be adopted and implemented by all employees, just as the Group's internal rules are fully implemented with respect to all duties within Şişecam Group. It should be noted that in case of violation of this policy, sanctions as severe as the termination of the employment contract may be faced within the framework of the relevant provisions set forth in the Şişecam Group Disciplinary Regulation and Collective Bargaining Agreement, in addition to legal regulations, and it should be noted that the matter is subject to regulations that may result in serious sanctions, including imprisonment in the country in question.

10. RELATED DOCUMENTS

Şişecam Group Limits of Authority
Şişecam Group Gift and Hospitality Policy
Şişecam Group Donation Regulation
Şişecam Group Code of Conduct
Şişecam Group Disciplinary Regulation

11. DOCUMENT HISTORY

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