



ŞİŞECAM GROUP POLICY ON ANTI-MONEY LAUNDERING, COMBATING THE FINANCING OF TERRORISM AND SANCTIONS

This policy demonstrates Şişecam's adherence to relevant legislation and international obligations regarding anti-money laundering, combating the financing of terrorism, and economic sanctions in its operating countries.

Şişecam complies with the economic sanctions, relevant legislation, and contractual obligations applicable to its operations. The Group takes all necessary measures for effective risk management. These measures include a risk assessment to identify risks related to anti-money laundering and combating the financing of terrorism, and sanctions for Şişecam's customers, products, services, supply chain, intermediaries, contracting parties, transactions, and geographic locations.

Şişecam does not become a party to activities related to money laundering or the financing of terrorism and weapons of mass destruction.

Under enforcement regulations, international organizations and countries may limit the transfer or supply of certain goods and services, information, materials, and technology. These sanctions can be against countries, organizations, and individuals. There are international sanctions by various countries, notably the EU members, the US and the UK, and by organizations such as the United Nations. With this in mind, Şişecam complies with local and international regulations on sanctions.

Şişecam recognizes its customers and business partners and conducts third-party due diligence using scanning tools to determine whether a customer, business partner or third party with whom it has a business relationship is subject to any sanctions.

In the evaluation of the customer/supplier, if the identity verification cannot be made because the documents and information cannot be obtained at all or on time, if the documents/information provided do not belong to the customer/supplier or are not reliable, Şişecam will not do business with the party in question until this information is provided.

If the customer/supplier or related parties are the sanctioned individual/organization or are related to any sanctioned individual/organization, Şişecam stops the transaction with the aforementioned party.

If a transaction involves a country that is the target of extensive United States sanctions (for example, if the customer or end-user is located in such a country or the goods come from such a country), Şişecam is careful not to make payments in US dollars or to have any affiliation with the US, including the involvement of US people or organizations.

Transactions with politically exposed persons, customers associated with high-risk countries/tax haven countries as assessed by relevant authorities, high-value cash-driven distributors/dealers, and non-profit organizations/charities and parties alike are considered as high-risk category. In transactions with these individuals and organizations, a detailed compliance review is carried out regarding the issues covered by this policy.

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Şişecam continuously updates its systems to ensure they are equipped to promote compliance with applicable sanctions and to combat money laundering and financing of terrorism.

Records of all financial and business operations are kept securely and accurately.

If Şişecam receives information requests about certain transactions, counterparties, and other information requests alike, from banks or financial institutions, public authorities, and similar institutions, it responds accurately and completely as soon as possible, to the full extent permitted by law.

All Şişecam Group employees (permanent, fixed-term, or temporary) are responsible for complying with this policy and implementing and supporting the relevant procedures in line with the requirements of this policy. Şişecam provides periodic training to relevant employees regarding this policy and keeps records of these training sessions. Şişecam expects all its business partners – distributors, service providers, contractors, consultants, vendors, agents, and alike – to comply with this policy. Şişecam takes all necessary steps to ensure compliance.

Those who suspect that this policy, applicable legislation, or Şişecam Group Code of Conduct have been violated can report the alleged violation to their immediate managers or notify the Şişecam Ethics Hotline at ethicshotline.sisecam.com.

Those who are conducting the activities establish control points that will provide reasonable assurance regarding compliance with this policy and apply them to their business processes. The effectiveness of the controls is tested periodically.

Violation of this policy by a Şişecam employee is grounds for disciplinary action. If any third party who is expected to act in compliance with this policy violates this policy, sets the grounds for termination of the business relationship with the relevant party, without prejudice to all legal rights of Şişecam Group.

The Board of Directors is responsible at the highest level for overseeing the implementation of the Policy. The Corporate Governance and Compliance Office is responsible for reviewing and updating the policy.

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