



POLICY ON ANTI-BRIBERY and ANTI-CORRUPTION



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We pledge that we will strictly comply with the principles as set forth under the anti-bribery laws and regulations in order to protect the reputation and integrity of our companies.

The zero-tolerance approach indicates that we are determined to fight bribery and corruption. We do not and will never bribe; we do not give and will never give inappropriate encouragement to anyone for any purpose; we do not accept and will never accept or let anyone accept bribe or inappropriate encouragement or anything that may be considered like this, and we expect that this approach is accepted by any third party, with which we are in a business relation for commercial purposes, including all the customers, suppliers, companies from which we purchase services, business partners and representatives.

In line with the Policy on Anti-Bribery and Anti-Corruption:

- Bribe and corruption of any type including facilitation payments, whether they take place directly or through a third party, is strictly prohibited.
- Gifts and hospitality should always be proportional and reasonable. Gifts and hospitality should be for legitimate purposes, and never cause or be perceived as a conflict of interest. Extravagancy and lavishness should always be avoided.
- No one is allowed in our companies to give gifts and/or donations to political parties, those with a position in a political party or their relatives and acquaintances, and candidates for a political position.
- Decisions on internships and secondments for a fee or free of charge should be based on merit, and should not be made for the purpose of inappropriately affecting the respective purchaser or those who are relatives or acquaintances of the respective purchaser.
- Our employees should not accept or give offers for travels and accommodations which are in general offered within the scope of a corporate entertainment package.
- Our employees should make sure that the donations they make are for well-intentioned/true charitable foundations, and not used to hide bribes.
- Our employees should be sure that any expenses and payments concerning third parties are accurately reflected on the respective financial records.
- Suspicious behaviors should be questioned and, any details (rumors) about inappropriate payments or operations should be reported to the management. Our employees are encouraged to report breaches through internal reporting channels.

This policy applies to the following group companies of Alplas.

- Acron Elektronik Sanayi ve Tic A.Ş

