

## **Anti-Bribery and Anti-Corruption Policy**

### **1. Purpose**

The purpose of this policy is to define our company's approach to combating bribery and corruption in the conduct of its business activities and to establish ethical and legal standards of conduct for all employees and business partners. Our company is committed to maintaining integrity, transparency, and adherence to ethical values in all business processes and adopts a zero-tolerance approach toward all forms of bribery and corruption.

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### **2. Scope**

This policy applies to:

- All employees of our company,
- Managers,
- Members of the Board of Directors,
- Suppliers and business partners,
- All third parties acting on behalf of the company.

Our company expects all stakeholders to act in accordance with the principles set forth in this policy.

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### **3. Fundamental Principles**

#### **Zero Tolerance for Bribery and Corruption**

Our company does not tolerate any form of bribery, corruption, or the provision of improper benefits.

#### **Prevention of Improper Payments and Benefits**

It is prohibited to offer, promise, authorize, provide, or accept any improper payment or benefit to or from public officials, business partners, or third parties for the purpose of obtaining or retaining a business advantage.

#### **Gifts and Hospitality**

Gifts and hospitality practices shall be reasonable, transparent, and compliant with applicable laws and regulations. Any practice that could improperly influence decision-making processes shall be avoided.

#### **Prevention of Conflicts of Interest**

Employees shall avoid situations in which their personal interests may conflict, or appear to conflict, with the interests of the company while performing their duties.

#### **Transparent Business Processes**

Company activities shall be conducted in accordance with the principles of transparency and accountability.

#### **Compliance with Laws and Regulations**

All company activities shall be carried out in compliance with applicable laws, regulations, and relevant international standards.

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### **4. Responsibilities**

- The Board of Directors and Senior Management support the implementation of the company's anti-bribery and anti-corruption approach
  - Managers are responsible for overseeing the implementation of this policy within their areas of responsibility
  - Relevant departments are responsible for developing and monitoring ethics and compliance processes.
  - All employees are required to comply with the principles of this policy and to report any suspected or actual violations.
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### **5. Effective Date**

This policy shall become effective upon approval by the Board of Directors and shall be binding on all employees and relevant stakeholders within the scope of the company's activities.

The policy shall be reviewed periodically and updated whenever deemed necessary.