



Genel Otomotiv Mamulleri San. ve Tic. A.Ş.

INSTRUCTION NO : TA-İKY-027

PAGE: 1/5

DATE:23/02/2021

REVISION NO: 00

REVISION DATE: -

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

### 1. Purpose and Scope of Application

#### 1.1 Purpose

The purpose of this policy is to outline the principles and practices of A Plas Genel Otomotiv Mamulleri A.Ş. regarding anti-bribery and anti-corruption and to ensure clear and unambiguous communication of these practices. This policy aims to identify, minimise and manage bribery and corruption risks in compliance with legal regulations, ethical and professional principles and universal rules.

#### 1.2 Scope

The anti-bribery and anti-corruption policy covers not only company employees but also all business partners acting on behalf of the company or providing services to the company. Accordingly, this instruction covers A-Plas Board of Directors, shareholders, subsidiaries and affiliates, intermediaries, proxy workers, customers, suppliers, contractors and all other parties with whom business is conducted.

A-Plas Code of Ethical Conduct and Implementation Principles available on the A-Plas website are an integral part of this policy. In this context, A-Plas Ethics Committee is responsible for the implementation and follow-up of the relevant rules and principles. This policy also undertakes compliance with the principles that we undertake to comply with in parallel with the United Nations Global Compact and other internal regulations and legal regulations of our Company.

#### 1.3 Definitions

Corruption offences are defined as "giving, offering, promising, receiving, accepting, demanding or requesting money, gifts, any kind of benefit, whether or not measurable in money, in order to obtain or maintain benefits during business activities".

A corruption offence may result not only in the punishment of the perpetrators of the offence, but also in legal or criminal sanctions for their managers and the companies they represent, if they violated their supervisory duties during the commission of the offence.

For the avoidance of doubt, it should be noted that the act of corruption also includes bribery.

Bribery refers to the provision of material or immaterial benefit directly or indirectly to oneself or to another person to be nominated by the other party within the framework of a verbal or written agreement in order to ensure that a person performs an action contrary to the requirements of his/her duty or outside the ordinary course of business by means of doing, not doing, speeding up or slowing down a job. The benefit that can be considered as bribery can be in many different forms such as cash, gift, invitation or ticket to an event, debt forgiveness, donation for charity purposes.

HAPreparing By: Human Resources Manager  
Umut Özüş

Approval: Chairman Of The Board  
Ahmet Ağaoğlu



Genel Otomotiv Mamulleri San. ve Tic. A.Ş.

INSTRUCTION NO : TA-İKY-027

PAGE: 1/5

DATE:23/02/2021

REVISION NO: 00

REVISION DATE: -

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

### 2. Reporting Bribery and Corruption Violations

In order to protect the reputation of our organisation, it is the responsibility of everyone listed above to report any violations of anti-bribery and anti-corruption rules.

Failure to report bribery and corruption to the relevant authorities or ignoring bribery and corruption acts even though they are recognised will also be considered as a violation of anti-bribery and anti-corruption rules.

Below is our confidential and anonymous communication channel to report questions related to the anti-bribery and anti-corruption policy, violations of the rules set out in this instruction, or suspicious situations that may damage our reputation and trust.

Anti-Bribery and Anti-Corruption Notification E-mail Line: etikkurul@a-plasltd.com.tr or whatsapp contact line 0 850 307 69 10

In cases where the applications are not made anonymously, it is the responsibility of A-Plas Ethics Committee and A-Plas Management to keep the information of the persons making the notification confidential and to take necessary measures to prevent any negative situation related to the notification.

### 3. Violation of Anti-Bribery and Anti-Corruption Rules and Consequences

All our employees and all business partners described in the scope above are obliged to know the rules contained in this policy and to act in accordance with these rules and the applicable anti-bribery and anti-corruption legislation while conducting their business. In case of violation of this policy, criminal sanctions are applied according to the nature of the incident.

Employees or business partners are not subject to any negative consequences as a result of refusing to participate in a bribery and corruption case or reporting a bribery or corruption case. In such a case, the reporting channels specified in this policy should be used.

### 4. Duties and Responsibilities

#### 4.1 Employees and Business Partners

All employees and business partners must act in accordance with the principles in this instruction text. Managers must ensure that the principles in this instruction text are understood, implemented and maintained by the business partners they are responsible for and the employees under their management. Employees and business partners cannot be forced to act contrary to this policy under any circumstances and by anyone.

All our employees and business partners should pay attention to signs of bribery and corruption. In case of such indications, it would be appropriate to seek the opinion of the Internal Audit Department.

HAPreparing By: Human Resources Manager  
Umut Özüş

Approval: Chairman Of The Board  
Ahmet Ağaoğlu



Genel Otomotiv Mamulleri San. ve Tic. A.Ş.

INSTRUCTION NO : TA-İKY-027

PAGE: 1/5

DATE:23/02/2021

REVISION NO: 00

REVISION DATE: -

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

### 4.2 A-Plas Ethics Committee

Within the scope of the Anti-Bribery and Anti-Corruption Policy, A-Plas Ethics Committee is responsible for the following issues:

- Developing, defining, publishing and supervising an effective anti-bribery and anti-corruption programme,
- Opinion on anti-bribery and anti-corruption issues,
- Adopting policy and instruction rules, making additions as necessary according to all relevant legal and regulatory requirements, and coordinating activities for the correct implementation of policy rules,
- Ensuring that the necessary communication channels are established to report behaviours contrary to the policy and instruction text, taking measures to ensure the confidentiality and security of the persons making the notification,
- Ensuring that the necessary examinations and investigations are carried out regarding the complaints, denunciations and allegations received on the subject.

Information on the A-Plas Ethics Committee and its functioning, which determines the duties and responsibilities of the A-Plas Ethics Committee and the way it works, is publicly available on the A-Plas website.

### 4.3 Reporting and Information Sharing

The issues within the scope of the anti-bribery and anti-corruption programme specified in this policy, as well as notifications and investigation results regarding acts of bribery and corruption are kept in a central database and reported periodically.

## 5. Anti-Bribery and Anti-Corruption Programme

A-PLAS has adopted the principle of complying with laws and regulations, universal legal rules, ethical and professional principles within the scope of bribery and corruption. Within the scope of this principle, A-PLAS acts with a "zero tolerance" approach against bribery and corruption and undertakes to carry out its activities in a fair, honest, legal and ethical manner. This Anti-Bribery and Anti-Corruption Policy and Instruction has been implemented as a requirement of the importance given to this issue.

HAPreparing By: Human Resources Manager  
Umut Özüş

Approval: Chairman Of The Board  
Ahmet Ağaoğlu



Genel Otomotiv Mamulleri San. ve Tic. A.Ş.

INSTRUCTION NO : TA-İKY-027

PAGE: 1/5

DATE:23/02/2021

REVISION NO: 00

REVISION DATE: -

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Within the scope of the anti-bribery and anti-corruption policy, activities are carried out and necessary measures are taken to fulfil the following issues:

-A periodically updated risk assessment is conducted, which provides a comprehensive picture of which parts of the processes and works carried out are susceptible to bribery and corruption. Based on the results of the risk assessment, controls are implemented to eliminate bribery and corruption risks in the required areas and processes.

- Training and awareness-raising programmes are conducted for employees and business partners on the legal requirements related to the anti-bribery and anti-corruption programme. Secure and accessible communication channels are provided for employees to report suspicious situations.

- A-PLAS prohibits any payment to facilitate or expedite any business. A-PLAS employees do not tolerate that the other party offers, promises, asks, requests, demands, gives or accepts this in their relations with third parties.

It is not permitted to offer, promise or give gifts, hospitality or hospitality or any other benefit, directly or indirectly, to foreign or local, government and public officials, unless there are necessary approvals (specific or general for a certain level of gift / hospitality).

- A-PLAS develops business partnerships with parties that A-PLAS believes will protect its reputation and work in compliance with A-PLAS anti-bribery and anti-corruption policy. In this context, prior to the establishment of any business partnership, including mergers and acquisitions, or the appointment of a representative, the counterparty in question is evaluated in terms of bribery and corruption risks and business ethics. Persons, suppliers, contractors, etc. who establish a relationship with A-PLAS and act on its behalf by proxy must agree to comply with legal regulations and all applicable anti-bribery and anti-corruption policies and instructions. In order to ensure this, relevant provisions are included in the contracts made.

- A-PLAS monitors blacklisted individuals and companies created in line with information received from public authorities, international data provider organisations and social media sources in order to ensure compliance with applicable regulations and the company's own rules. A-PLAS should not establish a relationship with any person or organisation that has been heard or suspected of bribing third parties, and if there is such a relationship, this relationship should be terminated immediately as of the date of receipt of the rumour.

In the execution of relations with private or official persons and organisations wishing to establish or maintain a business relationship with A-Plas, any gift, hospitality that may create the impression of the existence of an irregularity, that may cause or be perceived as a dependency relationship, other than 25 euro / 250 TL promotional materials, should not be accepted or offered. Likewise, no discounts or benefits of any kind that may be perceived as improper from suppliers, authorised services, customers or any third parties should be requested, offered or accepted when offered.

**HAPreparing By: Human Resources Manager**  
**Umut Özüş**

**Approval: Chairman Of The Board**  
**Ahmet Ağaoğlu**



Genel Otomotiv Mamulleri San. ve Tic. A.Ş.

INSTRUCTION NO : TA-İKY-027

PAGE: 1/5

DATE:23/02/2021

REVISION NO: 00

REVISION DATE: -

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

However, in cases where it is decided that refusal of the above-mentioned gift or hospitality is impractical or may lead to an undesirable result in terms of the business relationship, the acceptance and use of the gift in question may only be deemed appropriate with the written approval of the Human Resources Directorate. In case of acceptance of the gift in question, if its value is high, it should be considered to be donated to a charitable organisation.

- In order not to give the impression of bribery and corruption, any job offer made by A-PLAS must be carried out within the competitive recruitment processes determined by the company procedures and no job offers should be made to customers, business partners (or third parties closely related to them) or government officials and public officials.

- Political donations cannot be made on behalf of A-PLAS. Charitable contributions and sponsorships by A-PLAS must be legal and in compliance with company bylaws, policies, guidelines and regulations, as well as applicable local laws.

- The effectiveness of the anti-bribery and anti-corruption programme is regularly reported.

### 5. Training

It is ensured that all A-PLAS employees and business partners are informed about anti-bribery and anti-corruption issues and that the relevant parties are trained to internalise the principles contained in this policy.

### 7. Review

This policy is reviewed at regular intervals and necessary updates are made and all changes are announced through an announcement. The current version of these rules can be accessed continuously and easily through the company website.

HAPreparing By: Human Resources Manager  
Umut Özüş

Approval: Chairman Of The Board  
Ahmet Ağaoğlu