



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

INSTRUCTION NO: TA-İKY-028

PAGE: 1/5

DATE:23/02/2021

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GIFT AND HOSPITALITY POLICY

1. PURPOSE AND SCOPE

It is a part of the ordinary flow of life that Company employees have social relations with customers, business partners and suppliers. However, it is essential to ensure that these relationships do not lead to conflict of interest.

Within the scope of this policy; the procedures and principles regarding the legitimate framework of gifts accepted or given in order to strengthen business relations, participation in representation / hospitality activities organised by other organisations and representation / hospitality activities to be organised by our Company are described.

2. DEFINITIONS

Gift: Items that are given or accepted as a commercial courtesy or as a thank you, usually between people in a business relationship, which do not require a material or immaterial return.

Conflict of Interest: It refers to any kind of benefit or personal interest, which may or may not be measurable in money, provided to the employee, his/her relatives, friends or persons or organisations with whom he/she has a relationship, during the employee's decision-making or fulfilment of his/her duty. This situation must be immediately reported to the senior manager and the senior manager must immediately take measures to eliminate the situation.

3. BASIC PRINCIPLES

3.1. Employees may not receive gifts in violation of the Anti-Bribery and Anti-Corruption Policy, even in cases where it is in accordance with the law.

3.2. Company employees may not accept gifts from customers or business partners or suppliers from whom the Company purchases goods or services, and may not make any offer to solicit gifts in any way.

3.3. In exceptional cases where the will of the employees not to accept a gift is not accepted by the other party and there is a risk of damage to the business relationship, gifts that are in accordance with commercial customs and that do not have a high material value may be accepted.

3.4. Under no circumstances may gifts be accepted from Group companies or proposals to solicit gifts be made.

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3.5. Cash gifts, precious metals such as gold, diamonds or gifts that are easy to convert into cash cannot be accepted under any circumstances.

3.6. Non-cash offers such as free holidays, discount vouchers, gift vouchers, unusually high rate discounts are also considered as gifts and benefits and are not accepted.

3.7. Periodical promotions such as diaries, pens, calendars, etc. that have a nominal value rather than a monetary value may be accepted, provided that they are not requested by the employee personally.

3.8. Gifts that do not have a high monetary value (Article 3) are recorded in the relevant Unit/Department by indicating the name of the employee, date of acceptance, type, amount, presenting party. However, there is no need to keep a record for products within the scope of Article 7 of this Policy.

3.9. It is ensured that the gifts accepted do not create the impression that the gift giver is entitled to preferential treatment or any privilege, or that this situation does not damage the Company's image.

3.10. The above-mentioned regulations also apply to gifts given to family members within the framework of the relationships formed due to the duties of the employees.

3.11. Company employees may participate in entertainment and dining organisations for representation and hospitality purposes, provided that they are acceptable, reasonable and modest in the business world.

3.12. Provided that they do not propose it themselves and it is only for celebration purposes on special occasions, managers may accept gifts that do not have a high material value from their direct or indirect subordinate employees or employees may accept gifts from their subordinate managers.

3.13. For behaviours found to be contrary to the rules of this instruction, the necessary disciplinary action, up to and including termination of the employment contract, shall be taken within the framework of the Disciplinary Regulation and the relevant provisions and procedures of the Collective Bargaining Agreement. In case of legal conditions, it shall be reported to the judicial authorities.

3.14. If the Company or any party acting on behalf of the Company hosts an invitation, the travel and accommodation expenses of the guests shall be covered by the guests. Traveling and accommodation expenses of the Company's employees for the invitation and business purposes shall be paid by the Company. In both of the aforementioned cases, it is

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possible for the invitee to bear all travelling and accommodation expenses if there is a reasonable justification.

4. AUDIT

The audit of compliance with the provisions of this instruction is carried out annually within the scope of internal audit.

5. ENFORCEMENT

This policy and any amendments to this policy shall enter into force on the date of approval by the Board of Directors.

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