



NUH ÇİMENTO GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

VISION

The Anti-Corruption and Bribery Policy primarily aims to comply with national legislation and the international legislation referred to in this document, basic regulations, principles, recommendations and criteria, which are examples of good practice published by international organizations.

PURPOSE

The purpose of the Anti-Corruption and Bribery Policy is to ensure compliance with the anti-bribery and anti-corruption laws and regulations, ethical principles and universal rules applicable in all countries in which our Company operates, as well as to ensure compliance with the obligations regarding the prevention of financial crimes, to ensure that our customers, transactions, products and services are managed on a risk-based basis. approach, and to raise awareness of all our employees on these issues by determining our strategies to reduce possible risks, our relevant controls and measures, our operating rules and responsibilities.

This policy also aims to prevent the placement and laundering of the proceeds of crime, the source of which is bribery and corruption crimes, to eliminate and determine as much as possible the environment that may pave the way for bribery and corruption crimes between company employees-customers/business partners and aims to fulfill its commitments.

Company statement; covers the entire Nuh Çimento Group.

Promotions

Corruption: It is the misuse of existing resources and powers in any institution for personal purposes, directly or indirectly, for profit.

Bribery: It is the benefit of a person within the framework of an agreement with a third party to act contrary to the requirements of his duty by means of doing or not doing a job, speeding it up or slowing it down. Bribery and corruption can take place in many different ways, including:

- cash payments,
- Donations to political parties and charities,
- commissions received,

- Social rights that are used unequally and contrary to internal regulations,
- Present,
- Hospitality activities,
- Other interests

countable.

Anti-Corruption and Bribery : It was established within the scope of our company and business partnerships, to act as a control mechanism against the direct or indirect abuse of existing resources and powers for personal purposes and to prevent possible risks.

Third Party : Shareholders, affiliates, group companies, existing and potential; business partners, suppliers, partners are natural and legal persons within the scope of support service.

SCOPE

This policy applies to the members of the Board of Directors, the General Manager, Senior Managers and all company employees, our subsidiaries and affiliates and their employees, companies from which we receive outsourcing services, including legal support services, and their employees, suppliers, consultants, lawyers, external auditors. It includes individuals and organizations working on behalf of the company, including our customers, as well as our customers.

Focus Areas in Corruption and Bribery

Within the scope of this policy, business units are the main focus areas in order to comply with the policy and to continue the flows in a harmonious manner;

- Accepting and presenting gifts,
- Representation and hospitality activities,
- Facilitation Payments,
- Donations (Political and Charitable Contributions)
- abuse of office,
- Relations with third parties and business partners,



- Relations with Legal Authorities,
- Actions required within the scope of sponsorship relations

they should.

Acceptance and presentation of gifts ; These are the products and services that do not require any material or moral return between the existing business relationship and potential business expectations, and are provided for the purpose of commercial courtesy or thanks.

Representation and hospitality activities; are invitations, entertainment, meals, corporate communication organizations and training activities carried out for the purpose of representation and entertainment among persons in business or potential business relations.

facilitation payments; An informal, improper, small amount of payment made to a low-level official to secure or expedite the execution of a routine or necessary action to which the facilitating payer is legally entitled. Such irregular payments are tracked through notifications made to the Ethics Line.

donation payments; political contributions and charitable contributions. Political contributions or activities on behalf of the company are prohibited. In donations to charities, our Company requires compliance with the principles in the Ethical Principles Policy. Processes related to donation payments are carried out together with the opinions requested by the relevant business unit and are followed up as a result of notifications made to the ethics line.

abuse of office; means the use of the powers held in the decision-making process by obtaining special benefits. Such irregularities are followed through notifications made to the Ethics Line.

Relations with third parties and business partners; Shareholders, affiliates, group companies, existing and potential; Business partners, suppliers, partners, natural and legal persons within the scope of support service are considered as third parties under this policy. In the activities of our company with third parties, researches are carried out together with the opinions requested by the relevant business unit and are followed up as a result of the notifications made to the ethics line.

Relations with Legal Authorities; The gifts and treats that will be given directly or indirectly to the civil servants in the foreign or local legal authorities with whom our company is in contact due to legal regulations are limited to gifts of symbolic and non-material value.



Sponsorship relationships; It can be in the fields of sports, arts, culture, education, entrepreneurship and science or in the form of supporting an activity or organization. In the sponsorship processes of our company, researches are carried out together with the opinions requested by the relevant business unit and are followed up as a result of the notifications made to the ethics line.

It is absolutely unacceptable to take or give bribes, regardless of their purpose. These principles are also sought for third parties receiving or providing services, as well as business partners. Activities with third parties, which are all stakeholders other than employees of our company; should be maintained in a fair, transparent, honest, legal and ethical manner. It is strictly prohibited to make or receive improper payments or misconduct, directly or indirectly, against third parties, legal authorities, business partners and other parties with whom we have business relations, both internally and externally.

Matters to be Considered in the Scope of Anti-Corruption and Bribery Activities

Accurate Record Keeping

All substantiating documents emerging within the scope of focus areas should be submitted appropriately, records should be recorded completely, accurately and reliably, and relevant records should be kept ready for inspections and inspections by official institutions.

Reporting and Data Protection

An employee acting on behalf of the company should report to the Ethics Line when he suspects corruption within the company or in a party with the company, when he is offered a bribe, asked to pay a bribe, or engaged in any illegal activity.

Policy Violation

In case of violation of this policy, sanctions are applied in accordance with the provisions of the Business Ethics Rules Procedure.

If the violation of this policy is confirmed by examining the organizations from which foreign services are received and within the scope of business partnerships, the business relationship with the specified organizations is terminated as a result of the investigations.



Educational Activities

Trainings are an important tool to increase the awareness of the employees. The trainings to be provided cover all employees of our company.