

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. PURPOSE

1.1. The Anti-Bribery and Anti-Corruption Policy ("Policy") aims to outline the framework of principles and practices for combating bribery and corruption in compliance with legal regulations, ethical and professional standards, and universal rules, in order to ensure clear communication of these practices and to identify, reduce, and manage bribery and corruption risks at Aktif Elektroteknik Sanayi ve Ticaret Anonim Şirketi ("Aktif").

2. SCOPE

2.1. The Anti-Bribery and Anti-Corruption Policy applies not only to company employees but also to all business partners acting on behalf of or providing services to the company. Accordingly, this policy covers Aktif's Board of Directors, shareholders, affiliates and subsidiaries, intermediaries, agents, proxy employees, customers, contractors, and all other parties who conduct business with Aktif. All Aktif employees and managers are required to act in accordance with this Policy, which is an integral part of Aktif's approved Code of Conduct and Human Resources Practices. Aktif expects all business partners to act in compliance with this Policy, to the extent applicable to the relevant party and/or transaction.

3. DEFINITIONS

3.1. Corruption refers to bribery or any other form of illegal benefit, which directly or indirectly leads to deviations in the execution of duties or necessary behaviors in accordance with the law.

3.2. Bribery is the act of a person benefiting within the scope of an agreement with a third party, which leads to deviations in fulfilling their duties, such as doing, not doing, expediting, or delaying a task.

3.3. Bribery and corruption can occur in many different ways and areas, such as:

- Gifts
- Political Donations
- Entertainment Policy
- Facilitation Payments

4. DUTIES AND RESPONSIBILITIES

4.1. The Anti-Bribery and Anti-Corruption Policy has been approved by the Board of Directors. The implementation and updating of the Policy will be carried out through assignments made by the Board of Directors.

4.2. Within the scope of the Anti-Bribery and Anti-Corruption Policy, necessary processes, systems, and organizational structures have been established to comply with legal regulations and ethical principles at our company. Relevant duties and responsibilities have been documented.

4.3. The establishment and amendment of ethical principles and codes of conduct are under the authority of Aktif's Board of Directors, and disciplinary sanctions are applied to company personnel who violate these principles. The authority to examine such cases is delegated to the Disciplinary Committee by the Board of Directors.

4.4. Aktif carries out an Anti-Bribery and Anti-Corruption Program, which is a series of precautions aimed at identifying and reducing bribery and corruption risks.

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- 4.5.** Accordingly, Aktif fully complies with all valid laws and regulations while conducting its activities. It takes the highest level of responsibility in the fight against bribery and corruption.
- 4.6.** Aktif has defined policies and procedures that comply with the Anti-Bribery and Anti-Corruption Policy and clearly communicates them to all employees.
- 4.7.** Aktif conducts regular internal audits to evaluate the effectiveness of the Anti-Bribery and Anti-Corruption Policy. These audits help to identify potential risk areas, detect non-compliances, and take corrective actions when necessary.
- 4.8.** Additionally, all Aktif employees are responsible for complying with the policies set by the Board of Directors, effectively managing the risks related to their business areas, working in compliance with relevant legal regulations and Aktif practices, and reporting to the company in case of any behavior, activity, or practice that is contrary to this Policy.

5. OUR POLICIES AND PROCEDURES

5.1. Bribery and Corruption

Aktif does not tolerate any form of bribery and corruption and opposes all kinds of bribery and corruption. Our goal is to create an ethical and transparent business culture and ensure that our employees fully comply with laws and ethical standards.

5.2. Gifts

- 5.2.1.** A gift is a product generally given by customers or persons with which a business relationship is established as a means of thanking or commercial courtesy, and which does not require a financial payment.
- 5.2.2.** All kinds of gifts offered or given to third persons by Aktif and Aktif's employees must be offered in public, with good faith. Gifts are not accepted at Aktif except for symbolic gifts that comply with the terms and conditions of this Policy and do not have high monetary value given to the company and its personnel.
- 5.2.3.** Even if they comply with the specified terms in the policy, in such cases where accepting a gift may create a conflict of interest or may be perceived as such, gifts are not offered or accepted.

5.3. Facilitation Payments

- 5.3.1.** Within the scope of this Policy, facilitation payments are not offered to ensure or expedite routine transactions or processes (obtaining permits, licenses, documents, etc.) with state institutions.

5.4. Donations

- 5.4.1.** It is essential not to make any corporate or personal payment, gift, aid, or donation to influence any decision related to the continuation of the company's operations or any decision that might benefit the company during the phase of procurement and delivery of services. Supporting charities with funds collected by Aktif employees separately from their work is outside the scope of this policy. However, the principles in the Aktif Code of Conduct apply in such cases as well.

5.5. Hospitality Policy

- 5.5.1.** Hospitality may be offered to third parties to develop business relationships and establish a normal business communication network. These third parties may include customers, consultants, lawyers, auditors, and other companies that have a business relationship with AKTİF. Hospitality offered by AKTİF is openly and unconditionally presented with good intentions.
- 5.5.2.** In such cases, even if they comply with the provisions specified in the policy, hospitality offers are not made or accepted to avoid potential conflicts of interest or any perception of such conflicts.

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6. COMPANIES AND BUSINESS PARTNERS FOR GOODS AND SERVICES PURCHASED AND SOLD

- 6.1.** Companies and business partners that purchase and sell goods and services must comply with the Policy's principles and other relevant legal regulations, and those failing to comply will terminate their collaboration with AKTİF.

7. CORRECT RECORDING

- 7.1.** AKTİF's accounting and record-keeping system must comply with legal regulations. Accordingly, all accounts, invoices, and documents related to relationships with third parties (customers, suppliers, etc.) must be accurately, conclusively, and reliably recorded and preserved. There should be no tampering with accounting or similar commercial records regarding any transactions, and facts must not be distorted.

8. TRAINING AND COMMUNICATION

- 8.1.** Regular training is provided to all employees on combating bribery and corruption. These trainings ensure that employees understand the appropriate steps for detecting, reporting, and handling bribery and corruption. Additionally, continuous awareness is created among employees regarding ethical behaviors.

9. NOTIFICATION OF POLICY BREACHES

- 9.1.** If an employee or a person acting on behalf of AKTİF has an opinion or suspicion of non-compliance with this policy, it must be reported to the Disciplinary Committee. The AKTİF Code of Conduct is periodically reminded to AKTİF employees. All reports are kept strictly confidential. During the investigation and inquiry after the report, utmost attention is given to confidentiality rules, and priority is given to ensuring that the reporting individual does not suffer any harm.

10. POLICY BREACHES

- 10.1.** In case of non-compliance with the Anti-Bribery and Anti-Corruption policy, disciplinary sanctions may be considered, up to and including termination of employment, depending on the nature of the incident. The matter is reviewed by the Disciplinary Committee in cases of non-compliance with this policy, and if non-compliant behavior is identified in line with the legislation, appropriate sanctions are applied following the legislation.

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This document has been reviewed in accordance with the requirements of the integrated management system and approved via email