



**ANTI-BRIBERY & ANTI-CORRUPTION AND  
ANTI-MONEY LAUNDERING POLICY**

## 1. PURPOSE AND SCOPE

The main purpose of this Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy (**"Policy"**) is to set forth the framework of the principles and practices regarding anti-bribery, anti-corruption and anti-money laundering as PENTHOL Group of Companies (**"PENTHOL"**). This policy aims to identify, reduce and manage the risks of bribery, corruption and money laundering on the basis of universal legal rules and ethical principles.

The policy is also aligned with our Code of Conduct, policies and our Corporate Values. Our business practices refer to the PENTHOL Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy and PENTHOL Code of Conduct.

Our employees and managers within the countries in which we operate are obliged to act in accordance with this Policy. We also expect our Business Partners to uphold these principles and urges them to adopt similar policies within their own businesses.

## 2. DEFINITIONS

**Bribery:** It is the act of offering, giving or receiving "anything of value" with the aim to corruptly influence action/decision or obtain improper advantage over a business transaction or relationship.

**Business Partners:** It covers our suppliers, customers, contractors, all sorts of representatives, subcontractors and consultants, institutions/organizations with which we do business with including any other third parties.

**Conflict of Interest:** A situation in which an entity or individual becomes unreliable because of conflict between the personal interests and the professional duties and responsibilities.

**Corruption:** It is any act of deception or fraud in which a person uses his or her position of power to benefit himself or herself at the expense of others.

**Ethics and Compliance Committee:** It is the committee that works under the President of PENTHOL and decides on the actions to be taken in case of complaints and notifications that the ethical rules are violated within the scope of the PENTHOL Code of Conduct.

**Gift:** Any kind of goods and benefits that affect or may affect the impartiality, performance, decision or performance of the employee's duties and responsibilities, which have economic value or not, and are accepted directly or indirectly.

**Money Laundering:** It refers to a financial transaction scheme that aims to conceal the identity, source, and destination of illicitly-obtained assets.

## 3. GENERAL PRINCIPLES

As PENTHOL, we have adopted the principle of doing business in line with our ethical values.

We published our Code of Conduct in accordance with national and transnational laws and ethical standards in order to create a guide that regulates our relationships with our employees, customers, business partners, suppliers, competitors and society. Full adherence to the principles of our Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy shall be pursued in accordance with our Code of Conduct; no forms of bribery, corruption and money laundering shall be tolerated irrespective of their purpose.

There are various ways in which bribery and corruption can occur, among them; cash payments, political or other donations, commissions, social benefits, gifts, hosting and other benefits may be mentioned.

The establishment of the "**PENTHOL Anti-Bribery, Anti-Corruption and Anti-Money Laundering Compliance Program**" is envisaged to take place by the end of 2024 and studies shall be carried out in order to follow up the relating compliance program.

In relation to possible areas of risk where acts of bribery, corruption and money laundering could occur, we shall lay down the following principles:

- 1. Integrity:** In all our activities, we are guided by integrity, transparency, accuracy and high business ethics and compliance, and we expect our business partners to behave in the same way. It is essential that all our records relating to commercial and financial transactions must reflect the real situation. Payments rather than intended purposes shall not be authorized or paid. All kinds of accounts, invoices and documents pertaining to the relations with third parties (customers, suppliers, etc.) must be recorded and kept in a complete, accurate and reliable manner. In all transactions of PENTHOL, the required information is transferred to both business partners and official authorities in accordance with the legislation completely and on time.
- 2. Security of PENTHOL's Assets:** Our employees are responsible for the proper utilization of all existing PENTHOL assets and resources (i.e. intellectual property rights, technology, computer hardware/software, servers, real estate assets, equipment, company vehicles, cash books, invoices). Transactions shall be considered to ensure that PENTHOL assets and resources are not used for money laundering, financing of terrorism, included in such crimes and other forms of corruption or do not become an intermediary. PENTHOL shall not permit individuals or institutions to use its resources in connection with money laundering or financing terrorism, nor is it possible to make these illegal resources to be shown publicly legal.
- 3. Data Privacy:** PENTHOL shall own the information which it produces, stores or transmits using Information Technologies. In order to ensure that unauthorized persons are not able to access these sources of information, our staff shall adopt the necessary measures. Financial, technical and commercial data, customer/supplier/third party information, information relating to corporate governance issues, business plans, and all information that the company does not disclose to the public, including but not limited to, is not classified as confidential but is confidential. Our employees shall protect all confidential information-documents they access and take the necessary precautions while they perform their job. The privacy and security of aforementioned

personal data is expected to be very carefully observed by our staff.

- 4. Fair Competition:** As PENTHOL, we take full account of the rules and legislations governing competition within the countries in which we operate. Fair competition rules and laws prohibit plans, regulations, programs and written or oral agreements between competitors involved in prices, territories, market shares or customers. Such agreements with PENTHOL's competitors are forbidden for the employees of PENTHOL.
- 5. Conflict of Interest:** Our employees cannot take advantage of their current duties to benefit themselves, their relatives, families, third parties and organizations with which they have a business relationship other than the employment contract.
- 6. Personal Investments or Transactions:** Our employees have the right to make investment choices of their own and we are not interfering in their personal life. However, our staff must be allowed to act in a way which does not conflict with their interests as well as those of the PENTHOL and avoid making any transaction that could make an impression in this respect.
- 7. Accepting and Giving Gifts:** It is essential that our employees do not accept gifts or benefits from suppliers, service providers or other business partners that may cause them to make biased decisions and affect their behavior. In addition, the provision of gifts or benefits to the customers, third parties, bodies and organizations that might cause the same effects must not be attempted by our staff.
- 8. Working in a Second Job:** During working hours, our employees will not be able to do any additional work. His/her motivation or overall performance in the tasks for which he/she is responsible should not be affected by other work outside of working hours. Moreover, taking on a second job at the supplier or customer company is unethical and unacceptable.
- 9. Political Activities:** It is a personal decision of our employees to take part in any legal, politically or socially recognized activity. These initiatives are a personal process with all kinds of responsibilities and consequences, and the image of acting on behalf of our organization cannot be created in any way. Our employees shall not engage in political activity during normal working hours and will not use their company's name, title or organizational resources to do so.
- 10. Bribery, Fraud, and Misconduct:** We do not accept or pay bribes, kickbacks, fraudulent practices and all forms of illegal and unethical activity that may lead to unfair gains in the countries in which we operate. None of our employees shall offer, promise or give money or anything of value to any person with whom we have a business relationship, directly or indirectly, or mediate the payment of money or anything of value, in order to gain unfair advantage. Our employees must avoid unethical behaviors such as bribery, corruption and misconduct.
- 11. Facilitation Payment:** Neither cash nor other payment modes (gifts, services or benefits) may be used in order to accelerate or guarantee the results of transactions

conducted by government bodies in the countries in which we operate. The participation of people and organizations covered by this policy in facilitation payments shall not be permitted under any circumstances.

**12. Third Party Relationships:** Applicable laws regarding bribery and corruption do not permit any kind of improper payments made directly by Company employees or indirectly through an agent, consultant, distributor, or any other third-party representative acting for or on behalf of PENTHOL (collectively, “Third Parties”).

**13. Social Investments, Donations and Sponsorships:** Corporate social responsibility projects are an important part of PENTHOL's corporate identity, and we are interested in taking part in such social projects as well as charitable donations. All forms of in-kind and in-cash donation requests, suggestions regarding corporate social responsibility projects, corporate support and sponsorship requests are evaluated in terms of compatibility with our business models by PENTHOL's Top Management. We're keeping track of all our donations and sponsorships as well as making them publicly available.

#### **4. TRAINING**

We provide Anti-Bribery, Anti-Corruption and Anti-Money Laundering awareness training (through face-to-face or e-learning practices), which is available to all staff and mandated for selected staff working in high-risk priority departments such as Finance, Sales & Marketing, and Human Resources.

#### **5. IMPLEMENTATION, REVIEW AND ENFORCEMENT**

Our Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy was published on 30.11.2022 with the approval of our President. Our Ethics and Compliance Committee shall examine this policy on a regular basis, taking into account the current requirements and changes to our operating conditions. After approval of our President on the basis of a recommendation by our Ethics and Compliance Committee, amendments considered to be necessary shall take effect. In order to ensure that this Policy is observed and regularly followed-up on possible violations and suspicious situations identified as part of improvements, our President shall be in charge at the highest level.

Any employee who believes that there is a conflict between the language of the policy and our activities, has questions about this policy, or wishes to report a potential violation of this policy confidentially, can raise these concerns to the Human Resources Manager.

We shall also make effective use of our [ethics@penthol.com](mailto:ethics@penthol.com) hotline for the purpose of ensuring compliance with this Policy, in order to monitor possible violations and suspicious situations on a regular basis as part of improvements. We also strive to ensure that our Business Partners evaluate their operations within the scope of their commitments to international organizations in terms of Anti-Bribery, Anti-Corruption and Anti-Money Laundering. Policy-related feedback and possible Policy violations and non-compliances can be reported via [ethics@penthol.com](mailto:ethics@penthol.com).

Criminal sanctions may be applied according to the provisions of regarding legislation if any violations or suspicious situation are detected that is contrary to the principles laid down in this Policy.

PENTHOL Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy shall be made available to all our stakeholders, including employees, through our company website and intranet.