

<b>INTERPOLYMER</b>	<b>BRIBERY AND CORRUPTION POLICY</b>	<b>Doküman No : F-245</b> <b>Sayfa : 1/1</b> <b>Revizyon Tarihi:</b> <b>Revizyon No :00</b> <b>Yayın Tarihi : 01.01.2025</b>
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## **BRIBERY AND CORRUPTION POLICY**

### **Purpose**

**As INTERPOLYMER; we adopt a “zero tolerance” policy against bribery and corruption and conduct our activities in accordance with fair, legal and ethical rules. Our anti-bribery and anti-corruption policy covers the compliance of all our company employees with the anti-bribery and anti-corruption laws and ethical principles and other relevant international standards in all countries in which we operate.**

### **Scope**

**Our anti-bribery and anti-corruption policy covers all our company employees, including our board of directors, our suppliers and their employees, and other business partners from whom we receive external services.**

### **Responsibilities**

**The implementation and updating of the Anti-Bribery and Anti-Corruption Policy is under the authority, duty and responsibility of our Board of Directors.**

**All our employees;**

- To comply with the policies determined by the Board of Directors,**
- To effectively manage the risks related to their own fields of activity,**
- To work in compliance with the relevant legal regulations,**
- To report to the upper management in case of any behavior, activity or practice that is contrary to this policy.**

## **Application Principles**

### **1. Bribery and Corruption**

**Bribery can occur directly or indirectly in the form of providing personal advantage, promising, authorizing, requesting, etc. All types of Bribery and Corruption, whether directly or indirectly through another party, are strictly prohibited.**

**Corruption is a criminal offense in every field we operate in**

### **2. Gifts**

**Gifts and entertainment must always be proportionate and reasonable. Gifts and entertainment must be for a legitimate purpose and must not create any conflict of interest or the perception of such.**

### **3. Facilitation Payments**

**Facilitation payments are not allowed to secure or accelerate a routine transaction or a process (such as obtaining a permit, license, tender procedures, etc.) with Public Institutions.**

### **4. Donations**

**Our employees must ensure that the donations they make are made to bona fide/real charities and are not used to conceal bribery.**

**All charitable donations and social responsibility expenditures require the written approval of our Board of Directors.**

### **5. Keeping Records**

**All kinds of accounts, invoices and documents related to relations with third parties (customers, suppliers, other service providers, etc.) are recorded and preserved in a complete, transparent, accurate, fair and reliable manner.**

**Internal control systems have been established to prevent off-the-record transactions.**

**Care is taken not to make changes to accounting or similar commercial records related to any transaction and not to distort the facts.**

### **6. Representation and Hospitality**

**INTERPOLYMER may carry out limited representation and hospitality activities such as accommodation and dinner invitations in order to develop its commercial relations and establish a commercial communication network.**

**Event activities are carried out to a reasonable extent, and care is taken to ensure that representation and hospitality do not occur before a fundamental and important decision-making process.**

#### **7. Training and Communication**

**Our Anti-Bribery and Anti-Corruption Policy has been announced to our company employees and is constantly accessible through the institution's website.**

**Training is organized to raise awareness among our employees about anti-bribery and anti-corruption.**

#### **8. Reporting of Violations**

**Our company employees can report violations through internal reporting channels (Complaint Boxes, Disciplinary Board, etc.). If inappropriate behavior is detected, necessary sanctions are applied.**

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