

Trasta ESG Anti-Bribery and Anti-Corruption Policy

1. PURPOSE

The purpose of this policy is to ensure that Trasta ESG Danışmanlık A.Ş. (Trasta ESG) complies with anti-bribery and anti-corruption legal regulations, ethical and professional principles and universal rules and to protect the Company's reputation.

2. SCOPE

The policy covers all employees, agents, acting employees, suppliers, contractors and co-operatives (business partners) of Trasta ESG, including the Board of Directors.

Since the transactions and behaviours of the business partners to be worked with will have consequences in terms of Trasta ESG's reputation and responsibilities before the law, it should be ensured that the Trasta ESG Code of Ethics, regulations and procedures and this policy text are taken into account when determining and doing business with business partners and that business partners act in accordance with these rules. For this purpose, provisions may be included in the contracts to be made with business partners.

3. DEFINITIONS

Bribe; It is the act of a person acting contrary to the requirements of his duty and providing a certain interest by doing, not doing, accelerating, slowing down a job within the framework of the agreement reached with a third party.

Corruption; It is the abuse of the authority possessed due to the position for the purpose of gaining any kind of gain, directly or indirectly.

Bribery and corruption can be performed in many different ways such as;

- Cash payments
- Political or other donations
- Commissions
- Social rights
- Gifts, hospitality (other than those that are proportionate and reasonable)
- Other benefits

4. PRINCIPLES OF APPLICATION

Trasta ESG has "zero tolerance" for bribery and corruption in all forms. The company can take actions up to terminating the employment relationship with those involved in these activities, and impose disciplinary penalties on its employees. Disciplinary penalties are determined in accordance with Trasta ESG's Human Resources and Disciplinary regulations as well as its practices.

Trasta ESG employees should report suspicious or hesitant situations, including bribery and corruption, to their managers or to the internal reporting lines established by Trasta ESG specifically for this purpose. Employees are encouraged to report such cases. If the relevant manager is suspected, the manager who is at a higher level in the hierarchy is notified. The management conducts the necessary research on the subject communicated.

It is essential that the notifying employee and the content of the notification are kept confidential. At the end of the examination, if deemed necessary, feedback is provided to the employee who made the notification. All precautions are taken to ensure that the notifier does not face any retaliation due to the notification. So much so that false reports made in order to disparage someone else are not tolerated. These notifications are also subject to a decision regarding the continuation of the employment relationship or disciplinary action.

5. RESPONSIBILITIES

The Board of Directors is responsible for the implementation and up-to-date continuation of this Policy. The Board accepts this policy text and provides the necessary environment for its implementation, establishes and develops internal control systems in order to prevent bribery and corruption, ensures the establishment of the necessary communication channels for reporting behaviours contrary to the policy text, and takes measures to ensure the confidentiality and security of the persons who make the report; ensures that the necessary examinations and investigations are carried out within the framework of the legislation regarding the complaints, notices and allegations received on the subject; It ensures that audits are carried out and corrective measures are taken to ensure compliance with legal regulations, regulations, procedures and policies.

The Anti-Bribery and Anti-Corruption Policy is announced to Trasta ESG employees and is made available to employees at all times and in areas where they can be easily accessed. It is ensured that newly recruited employees are absolutely aware of the policy. In case of need, the content of the policy is conveyed to the employees through the designed training programs.

6. RELEVANT REGULATIONS

This Policy is an integral part of Trasta ESG's Code of Ethics, the regulations on Human Resources and Donation and its practices in these matters, the external legislation and other legal regulations that it has to comply with.

7. EFFECTIVE

The policy enters into force following the approval of the Board of Directors.