



## Anti-Bribery and Anti-Corruption Policy



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Document No	: YS.KPH.002
First Publication	: 18.1.2017
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### 1. Purpose

The purpose of this policy is to identify anti-bribery and anti-corruption policies and behaviors, identify the position of Kuralkan against bribery and corruption, and provide information and guidance in this struggle.

### 2. Scope

Anti-bribery and anti-corruption policy applies to:

- All Kuralkan employees
- All persons and entities that provide services for or on behalf of Kuralkan, including the companies and employees and subcontractors, business partners, suppliers, agencies and agents that we receive products and services from.

### 3. Definitions

**Corruption:** Means the direct or indirect abuse of the possessed powers in the present position and the attempt to gain profit in this way.

#### **Bribery:**

Means provision of interest for a person or another demanding party or another party pursuant to an agreement made with another person so as to violate the requirements of the job by provision, offer, promise, demand or acceptance of a benefit, offer or promise by a person, directly or through intermediaries, to do, to have done, not to do, to accelerate, to slow down a business related to his/her duties; or by acting as an intermediary for these.

Bribery and corruption can be made in many different ways.

#### **Some examples:**

- Cash payments,
- Commission
- Gifts and entertainment that do not conform to business ethics principles
- Inappropriate political and other donations
- Other benefits



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### 4. Policy and Procedures:

Being consistent, fair and honest are the most important values for Kuralkan. It is the general policy of the Kuralkan to do business in compliance with ethical standards and to abide by the law.

#### 4.1. Bribery and Corruption

Kuralkan is against all kinds of bribery and corruption and shows zero tolerance.

The business relation with the third parties who wish to continue the business through bribery or corruption should be terminated.

#### 4.2. Gift

Gift is a thank you or commercial courtesy product given by people or customers who do not require a financial payment and are usually in business relationship. All gifts offered or given to third parties by Kuralkan should be offered in good faith and unconditionally.

No gifts may be accepted except for symbolic gifts that do not have high monetary value. In addition, even if it is within this scope, the gifts should not be frequent, and the accepting person should notify the company HR and senior management through his/her superiors.

It may be acceptable to receive or give corporate promotions, consumables etc. as long as you do not demand them and they do not influence or seem to influence your impartiality or judgment. As a general rule, if the acceptance of a gift makes you or a person in the same position feel liable, the gift cannot be accepted.

Larger gifts can lead to more conflicts of interest. Accordingly, the approval of Kuralkan management is required to receive or give a gift that is worth more than \$ 50 per person every twelve months. Since even a gift in good faith may be treated as bribery under certain circumstances or create conflict of interest, we always act with prudence, care and measured when a gift or meal is offered to the suppliers' employees.

As the gifting party, we never, under any circumstances, offer anything of value to obtain or withhold an interest or advantage and influence or make liable the supplier's employee or make them compromise their judgment.

Care is taken to ensure that the gift given applicable under the principles of the business unit and the country of the supplier's employees, all gifts and meals are in compliance with the relevant applicable law and the person giving and/or receiving the gift does not violate the relevant principles and complies with the local traditions and practices.

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### 4.3. Facilitation Payments

No facilitation payments are offered to secure or accelerate a routine operation or process (obtaining permits and licenses, obtaining documentation, etc.) with government agencies by to persons or entities within the scope of this Policy.

Kuralkan does not make any facilitation payments and does not tip. Facilitation payments are generally small, informal payments made to ensure that a government official speeds up routine government processes. Tips are general payments made on behalf of a goodwill or business advantage. Any activity which may lead to any tip or facilitation payment to be made or accepted on Kuralkan side is avoided.

If you are asked to make a payment on behalf of Kuralkan, you must always have an idea of what the payment is to be made for and whether the price is appropriate for the service provided. A receipt or invoice is always required indicating the reason for payment.

### 5. Treats

If its main purpose is regarding the business and your participation includes ordinary, traditional and business issues, corporate entertainment such as business meals, events, social activities or social gatherings can be accepted.

For events you organize your business, you must not exceed the max. \$100 level. Every kind of treats above this level needs to be approved by the senior management together with strong evidence that it is relevant to the business.

### 6. Travel

There are certain rules of Kuralkan concerning the payment of travel expenses in business related events. In order to cover travel expenses, it is mandatory that the purpose of the activity to be carried out is related to the development of Kuralkan's business. Travel time only has to include the activity period, which includes the event process and the subsequent meetings. No personal excuse to extend this period can be a reason for the payment of travel costs. If you travel by airplane, you will be choosing economy class, permission from management is required for business class.

### 7. Charitable Donations

Every charitable contribution and sponsorship must be made in an open and transparent manner. Before any donations or sponsorships are made, all details should be approved by the management to reduce the risk of being considered or deemed as bribery and corruption activity.

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### 8. Expenses and Expense Approval

All Kuralkan employees and all persons and organizations serving on behalf of Kuralkan need to request and get approval for all kinds of gifts, hospitality, travel, and meals.

### 9. Duties and Responsibilities

The implementation and updating of the Anti-Bribery and Anti-Corruption Policy is under the authority, duty and responsibility of the Disciplinary Committee within the knowledge of the Board of Directors. Additionally, all Kuralkan employees are responsible for ensuring compliance with the policies set forth by the Board of Directors, working in accordance with the relevant legal regulations and reporting any acts, operations or practices in violation to this policy to the Disciplinary Committee. Kuralkan employs senior managers who are responsible for monitoring the compliance.

### 10. Recording and Reporting

The issues to be complied by Kuralkan in terms of accounting and registration system are regulated by legal regulations. According to this;

- All kinds of accounts, invoices and documents belonging to third parties (customers, suppliers, etc.) shall be recorded and kept in a reliable, complete, precise and correct manner,
- No falsification shall be made on any accounting or similar commercial records of any transaction, and the facts shall not be diverted.

### 11. Training and Communication

The Anti-Bribery and Anti-Corruption Policy has been announced to Kuralkan employees and it is continuously and easily accessible via QDMS.

Since training is important for raising employees' awareness, Human Resources, Administrative Affairs, Finance, Legal and Accounting departments design training programs to which all employees are obliged to participate.

### 12. Reporting Policy Violations

If an employee or a person acting on behalf of Kuralkan has an opinion or suspicion that a person is acting contrary to this policy, this must be reported to the Disciplinary Committee. The issues related to the Kuralkan Code of Business Ethics are reminded to employees at certain periods.

Companies or business partners who supply us products and services should also remind their employees regularly about Code of Business Ethics and encourage them to report if they encounter such situations. If a situation arises that violates the anti-bribery and anti-corruption policy and/or the code of business ethics, the contact person of the supplier (or a member of the supplier management) shall be informed.

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### 13. Policy Violations, Observation and Review

The effectiveness of this policy is observed and its implementation is examined regularly and its suitability, adequacy and effectiveness is reported to the Board of Directors of Kuralkan. Any improvements determined by the Board of Directors shall be implemented as soon as possible. Internal audit systems and procedures are reviewed to ensure that they are effective in combating bribery and corruption.

Employees are free to comment on this policy and make suggestions for improvement. Comments, suggestions and questions are directed to the upper management. In cases that are or may be contrary to the policy, the case shall be examined by the Disciplinary Committee and the necessary sanctions shall be applied in case of the detection of inappropriate behavior.

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