

## **BATIÇİM ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

### **1. PURPOSE**

The primary purpose of Batıçım Batı Anadolu Çimento Sanayii A.Ş.'s Anti-Bribery and Anti-Corruption Policy ("Policy") is to ensure Batıçım's full compliance with ethical values and legal regulations, to safeguard business ethics standards, to establish a framework for preventing bribery and corruption, and to inform employees on these matters.

This Policy aims to maintain healthy and fair business relationships with employees, business partners, and solution partners, to establish a transparent business culture, and to protect and strengthen Batıçım's reputation. At the same time, this Policy seeks to define the rules, principles, and responsibilities to be followed in identifying and preventing actions that may be considered bribery or corruption.

This Policy applies to Batıçım's employees, managers, business partners, and solution partners at all levels, including Members of the Board of Directors. It also provides a general framework applicable across all regions in which Batıçım operates.

### **2. SCOPE**

This Policy covers all units, departments, and business processes within Batıçım. In addition, the scope of the Policy is reviewed and updated on a continuous basis and at least once a year to ensure compliance with ethical, legal, and business-related developments.

Batıçım expects its suppliers, contractors, business partners, and solution partners to comply with this Policy and to exercise due diligence regarding the matters addressed herein. For this purpose, Batıçım includes provisions requiring compliance with this Policy in its contracts with suppliers, contractors, and business partners.

### **3. DEFINITIONS**

#### **3.1 Bribery**

Bribery refers to unethical conduct aimed at influencing decisions or actions related to a duty by directly or indirectly offering payment or any other benefit in an unlawful manner in order to perform or refrain from performing an act incompatible with the requirements of that duty. Without limitation, bribery may take the form of financial gains, gifts, hospitality, donations, or other advantages.

#### **3.2 Corruption**

Corruption encompasses unethical and unjust actions carried out by abusing positions held and authorities exercised within Batıçım in order to influence decisions, obtain financial advantages, or secure personal gain. This may include, but is not limited to, the misuse of Batıçım's assets, interference in internal operations, requesting, offering, promising, giving, or accepting bribes or any other unlawful benefit, obtaining any material or immaterial gain measurable in monetary terms, fraud, and deceptive financial practices.

### **4. RESPONSIBILITIES**

All Batıçım employees and managers at every level, including senior management, are responsible for complying with, implementing, and supporting this Policy. Batıçım expects and supports all suppliers, contractors, business partners, and solution partners in acting in accordance with this Policy.

#### **Senior Management**

Senior Management's primary responsibilities include:

- Approving and enforcing the Policy and approving updates when necessary,
- Ensuring that the Policy is reviewed regularly and at least once annually and updated when required,
- Ensuring the implementation of the fundamental principles set forth in the Policy,
- Leading the Policy and encouraging its effective implementation,
- Distributing the Policy throughout Batıçim,
- Supporting ethical values and promoting them within Batıçim's corporate culture,
- Coordinating and supervising the implementation of the Policy across Batıçim's units and departments,
- Establishing notification, investigation, and sanction mechanisms in cases of non-compliance with the Policy and applicable anti-bribery and anti-corruption legislation, and
- Ensuring that business processes and decisions are conducted in accordance with the principles of fairness, impartiality, and transparency.

In this context, Senior Management adopts the principle of **"Fairness, Impartiality, and Transparency."**

### **Employees**

Each employee is responsible for:

- Complying with this Policy,
- Completing assigned training programs to ensure understanding and internalization of the Policy,
- Reporting suspected Policy violations to the Ethics Committee in accordance with the procedures set out in the Policy, and
- Adopting transparency and ethical standards in relationships with business partners, contractors, and suppliers.

Accordingly, employees adopt the principle of **"Transparency in Relationships."**

### **Ethics Committee**

The Ethics Committee is primarily responsible for:

- Ensuring that reports are reviewed and/or investigated in a timely, fair, and sensitive manner, while taking measures to protect the confidentiality and security of reporting individuals,
- Conducting ex officio investigations in cases deemed suspicious,
- Completing relevant investigation and reporting activities upon instruction from Senior Management, and
- Ensuring that corrective actions are taken and compliance with the Policy is restored in cases where violations are identified.

## **5. IMPLEMENTATION**

- Batıçim commits to establishing transparent, fair, and ethical relationships with its employees, suppliers, contractors, business partners, and solution partners.
- Bribery, corruption, and all forms of unlawful activities are strictly prohibited.
- All business processes and relationships shall be conducted in accordance with the principles of integrity, transparency, and accountability.

The implementation of this Policy is based on principles defined within Batıçim and is shaped around the following key pillars:

### **Training and Awareness**

Employees are provided with regular training on combating bribery and corruption, and awareness-raising programs are conducted.

### **Internal Audit and Risk Assessment**

Regular internal audits are carried out, potential risk areas are identified, and preventive measures are implemented.

### **Reporting and Investigation Mechanisms**

Reliable reporting mechanisms are established for employees and business partners to report suspicious situations. Reported cases are subject to a transparent internal investigation process.

### **Legal Cooperation and Sanctions**

In cases of Policy violations, actions are taken in accordance with legal procedures and sanctions are applied while observing legal obligations.

### **Monitoring and Updating the Policy**

The Policy is periodically reviewed and updated as necessary to ensure compliance with changing legal regulations and internal and external conditions.

The core implementation principles under this Policy are carried out by Senior Management or by managers and employees authorized by Senior Management.

## **5.1 Key Risk Areas for Bribery and Corruption**

Batıçim has identified the following as the primary risk areas for potential bribery and corruption:

- Acceptance of gifts
- Facilitation payments
- Relationships with suppliers, contractors, and business partners
- Representation and hospitality
- Sponsorship
- Political activities
- Accuracy of records

### **5.1.1 Acceptance of Gifts**

Batıçim employees and managers may not offer or accept gifts in relationships with public officials, customers, suppliers, contractors, or other business partners where such gifts may create or be perceived as creating a conflict of interest.

In all cases, employees and managers may not accept gifts exceeding a monetary value of USD 50.00 (fifty). If such a situation arises, the gift must be politely declined with reference to this Policy.

The total value of gifts accepted from various sources within a calendar year may not exceed USD 250.00 (two hundred fifty). For each gift accepted with a value not exceeding USD 50.00, employees must complete a "Gift

Acceptance Declaration Form” and submit it to the Human Resources Department. These forms shall be retained in the employee’s personnel file.

### **5.1.2 Facilitation Payments**

Facilitation payments are defined as payments made to public institutions or their employees to secure or expedite routine governmental actions (e.g., permits, licenses, tender procedures).

Batiçim does not permit its employees, suppliers, contractors, business partners, or solution partners to offer or accept facilitation payments of any amount for the purpose of securing or expediting routine processes.

### **5.1.3 Relationships with Suppliers, Contractors, and Business Partners**

Batiçim conducts its business processes with suppliers, contractors, business partners, and other third parties based on transparent and objective criteria. Third parties acting on behalf of Batiçim must comply with this Policy and ensure that their employees do the same.

Employees and managers are responsible for assessing and monitoring third parties’ compliance with this Policy prior to and during business engagements. Appropriate mechanisms must be established and updated as necessary by authorized personnel.

Batiçim shall not engage in business relationships with third parties that do not have a structure compliant with this Policy. Employees and managers must ensure that contractual, operational, and other mechanisms are in place to prevent Policy violations by third parties and to minimize potential harm to Batiçim.

### **5.1.4 Representation and Hospitality**

Batiçim may conduct representation and hospitality activities when necessary to develop commercial relationships, including social events, accommodation, meals, training sessions, symposiums, conferences, and seminars.

Hospitality may be offered in good faith, openly, and unconditionally. Even if compliant with this Policy, hospitality that may create or be perceived as creating a conflict of interest is prohibited.

### **5.1.5 Sponsorship**

All corporate support and sponsorship requests related to Batiçim’s activities are submitted to the Corporate Communications Department. Requests are evaluated objectively and submitted to the Executive Committee for approval. Sponsorship support is provided only after Executive Committee approval.

### **5.1.6 Political Activities**

Participation in political activities is a constitutional and internationally recognized human right. Batiçim respects employees’ voluntary participation in lawful political activities outside working hours, provided company resources are not used.

Batiçim does not support any political ideology or party. Company resources may not be used for political donations, promotions, or support, and political campaigning is prohibited on Batiçim premises.

Employees must ensure that political activities do not create conflicts of interest, do not involve the use of Batiçim’s name, title, or resources, and are not conducted during working hours.

### **5.1.7 Accuracy of Records**

Batiçim conducts all accounting activities in accordance with legal regulations and maintains complete, accurate, transparent, and truthful records. No alterations may be made to accounting or commercial records.

Batiçim provides reasonable assurance that:

- Internal control systems prevent off-the-record transactions,
- Controls are conducted under proper authorization,
- Financial statements are prepared in accordance with generally accepted accounting principles, and
- Reporting does not misrepresent facts.

## **5.2 Key Principles in Combating Bribery and Corruption**

### **5.2.1 Zero Tolerance Commitment**

Batıçım has zero tolerance for bribery and corruption. No tolerance is shown toward any bribery or corruption by employees or third parties acting on behalf of Batıçım.

### **5.2.2 Commitment to Non-Tolerance of Bribery**

Employees and managers may not make, accept, or tolerate any payment or benefit that may be construed as bribery. All employees must comply with the "Code of Business Ethics and Working Principles."

### **5.2.3 Confidentiality**

Information sharing with third parties must be conducted in accordance with confidentiality principles. Employees must protect confidential information and ensure appropriate safeguards are in place. Disclosures required by law are excluded.

### **5.2.4 Training and Communication**

This Policy is announced internally and accessible electronically via Softexpert and on Batıçım's website. Mandatory training programs are provided, and all new employees must complete anti-bribery and anti-corruption training within their first week of employment.

## **6. VIOLATIONS AND CONSEQUENCES**

Suspected Policy violations must be reported to the Ethics Committee via **etik@batianadolu.com** or in writing. Reports are handled confidentially, and retaliation is strictly prohibited. Violations are investigated, and sanctions are applied where necessary.

Contracts with third parties include provisions allowing Batıçım to terminate agreements unilaterally for just cause in cases of Policy violations.

## **7. EFFECTIVE DATE**

This Policy enters into force upon approval by the Members of the Board of Directors.

## **8. ENFORCEMENT**

This Policy is reviewed and updated by the Human Resources Department as needed.

## **9. RELATED DOCUMENTS**

- Code of Business Ethics and Working Principles
- Gift Acceptance Declaration Form