



FORM SÜNGER VE YATAK SANAYİ TİCARET A.Ş.

COMPETITION POLICY

Parent Process: Ethics

Child Process: Competition

Policy: Competition Policy

Policy No:

First Published:

Approved by:

Revision No:

Latest Revised:

Approved by:

SECTION 1. OBJECTIVE

1.1. Form Sünger ve Yatak Sanayi Ticaret A.Ş. (hereinafter, "Company") is committed to acting in accordance with the applicable competition laws and regulations and creating an ethical and fair competition environment. Competition Policy (hereinafter referred to as the "Policy") is developed in order to create a guide to ensure that Company employees and business partners avoid anti-competitive behavior and act in compliance with competition law and the Company's ethical standards.

SECTION 2. DEFINITIONS

2.1. Terms used in this policy that have a specific meaning are briefly defined below:

Company: Form Sünger ve Yatak Sanayi Ticaret A.Ş.

Policy: Competition Policy

Employees: Company managers and workers.

SECTION 3. SCOPE

3.1. This policy applies to



- a) General Manager,
- b) Employees
- c) Service or good vendors, and their employees,
- d) Other persons including all individuals and organizations working for Company including consultants, lawyers, advisors and external auditors, as well as customers with a business relation with Company ("**Business Partners**").

SECTION 4. PRINCIPLES

4.1. Company strictly disapproves of practices contrary to competition law and regulations such as forming cartels, price manipulation, restricting competition and undertakes to conduct all kinds of competition in a fair, transparent and legal framework.

4.2. Compliance with Laws and Competition Rules

4.2.1. Company and its employees ensures full compliance with applicable competition law.

4.3. Avoiding Colliding and Negotiating with Competitors

4.3.1. Company does not engage in illegal agreements and activities aimed at restricting competition under any circumstances. Meetings and negotiations with competitors are carefully conducted in compliance with competition law.

4.4. Not Allowing Abuse of Dominant Position

4.4.1. Company develops policies and processes to prevent abuse of dominant position. In dominant markets, anti-competitive behavior should be avoided and unfair practices such as exclusion of competitors should be avoided.

4.5. Trade Secrecy and Information Sharing

4.5.1. Company employees should refrain from sharing confidential information that may affect the trade secrets and competitiveness of the organization with competitors and take necessary precautions regarding trade secrecy.

4.6. Avoiding Participation in Anti-Competitive Associations

4.6.1. Company assesses the risk of anti-competitive behavior of sectoral associations and takes necessary measures.



4.7. Compliance of Business Cooperation Agreements with Competition Rules

4.7.1. Company ensures that all business cooperation agreements comply with competition rules. Company arranges all its agreements and communications in accordance with competition law. All contracts and negotiations with customers, suppliers, business partners and competitors must comply with competition law and ethical rules.

SECTION 5. ROLES AND RESPONSIBILITIES

5.1. General Manager

5.1.1. General Manager is responsible for the implementation of the principles and guidelines set out in the Policy and for the determination and operation of reporting, investigation and sanction mechanisms in cases of actual and suspected violations of these principles and guidelines.

5.2. Ethics Board

5.2.1. Ethics Board is responsible for establishing the communication channels required for reporting of the material breach or suspected breaches of principles set out in this Policy and takes actions to maintain secrecy and safety of the reporting persons.

5.2.2 Ethics Board carefully addresses the complaints and reports received and initiates necessary investigation. Should any violation is identified as a result of investigation, it submits it along with necessary evidences and documents to Internal Audit Department for duly action. In addition, it takes necessary actions and establishes necessary mechanisms to prevent recurrence of same breach.

5.3. Internal Audit Department

5.3.1. Internal Audit Department objectively evaluates the cases where breach and suspected breach of the principles set out in this Policy with a potential to result in Disciplinary Penalty in accordance with the provisions of relevant legislation.

5.3.2. Internal Audit Department is authorized to

5.3.2.1. Take defense from the employee who are allegedly in violation of this Policy, initiate an investigation, suspend and terminate the job contract, and exercise its rights in accordance with the Labor Law and applicable legislation.

5.3.2.2. stop receiving services from advisors, lawyers and financial experts who have violated this Policy and to terminate their hiring contracts.



5.3.2.3. stop, suspend and terminate business relations with business partners who have violated this Policy.

5.4. Employees

5.4.1. Company employees are responsible for ensuring compliance with this Policy, working in compliance with internal and external legislation and reporting through the Ethics Hotline in case of any behavior, attitude, transaction, action, decision, activity or practice in violation of the Policy.

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SECTION 6. EFFECTIVENESS

6.1. This Policy is made effective with a Resolution of General Manager. This Policy will remain in full force and effect until a revised version is put into effect.

SECTION 7. REVIEW

7.1. This Policy is subject to regular review by Ethics Board annually on the basis of changes to the processes or technical infrastructure. Reviewed and updated policy will be signed off by General Manager.