



## FORM SÜNGER VE YATAK SAN. TİC. AŞ

### ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

**Parent Process:** Ethics

**Child Process:** Anti-Bribery and Anti-Corruption

**Policy:** Anti-Bribery and Anti-Corruption Policy

**Policy No:**

**First Published:**

**Approved by:**

**Revision No:**

**Latest Revised:**

**Approved by:**

#### SECTION 1. OBJECTIVE

**1.1.** Anti-Bribery and Anti-Corruption Policy (hereinafter, "Policy") aims to clearly define the stance of Form Sünger ve Yatak Sanayi Ticaret A.Ş.'s (hereinafter, "Company") against bribery and corruption. With this policy, Company aims to comply with anti-bribery and anti-corruption laws and regulations and ethical principles in the countries where it operates, and to determine the responsibilities and rules in this regard.

#### 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.

**Employees:** Company managers and workers.

**Bribery:** A person acts contrary to the requirements of his/her duty by doing, not doing, speeding up or slowing down a work under an agreement with a third party in order to obtain a certain benefit.



**Corruption:** Soliciting, offering, giving or accepting a bribe or any other illegitimate benefit that leads to deviations from the lawful performance of duties or required conduct by a person who, by virtue of the position held, directly or indirectly, obtains a bribe or illegitimate benefit.

**Donation:** Refers to material aid or products provided gratuitously in order to raise awareness of corporate responsibility among stakeholders and employees, to meet social and community needs and to benefit the public.

**Gift:** Products and services that do not require a monetary payment and are usually provided as a show of appreciation or business courtesy by business partners or suppliers.

### **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. Bribery and Corruption**

**4.1.1.** Company has established an anti-bribery and anti-corruption policy to show its sensitivity to business ethics. Bribery and corruption can take many different forms, including



- a. Cash payments, political or other donations,
- b. Commission,
- c. Facilitating payments,
- d. Social benefits,
- e. Hiring relatives,
- f. Promotion

and other benefits.

**4.1.2.** In line with principles set out in this Policy, Company undertakes to carry out its activities in a fair, transparent, honest, legal and ethical manner.

**4.1.3.** Company is highly sensitive to anti-bribery and corruption, opposes bribery and corruption, and does not tolerate activities involving bribery and corruption. It is therefore unacceptable to offer, imply, receive or give bribes.

**4.1.4.** Company does not adopt the principle of continuing business relations with third parties who want to work with Company through bribery.

**4.1.5.** Employees shall not be penalized for delay or loss of earnings resulting from their refusal to give or receive a bribe.

**4.1.6.** Company complies with local and country laws, regulations and principles regarding anti-bribery and anti-corruption. It complies with the Council of Europe Private Law Convention against Corruption and Criminal Law Convention against Corruption, to which Turkey is a party, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, which are regulated against bribery and corruption within the scope of its activities.

## **4.2. Public Relations**

**4.2.1.** It is unacceptable to promise or imply to give any gift and/or thing of value to a Civil Servant, or to make any kind of payment, direct or indirect, for the purpose of influencing an official action or decision.

**4.2.2.** In addition, employees may not bribe civil servants, directly or indirectly, to obtain benefits in public works.

## **4.3. Agreements and Tenders**



**4.3.1.** Company takes care to comply with this policy in the agreements in which it is involved, in the initiation or continuation of a business relationship and in public or non-public tenders. In addition, Company is expected to act in accordance with this policy in merger and acquisition transactions and joint venture processes, and the companies targeted in these processes or the companies with which Company works are expected to act in compliance with this policy.

#### **4.4. Facilitating payments,**

**4.4.1.** Facilitating payments to secure or expedite a routine transaction or process (such as obtaining permits, licenses, tender procedures) with public authorities are not permitted.

#### **4.5. Record Keeping**

**4.5.1.** The matters that Company has to comply with regarding the accounting system are regulated within the framework of the relevant legislation and regulations. Company exercises care to

- a. record and maintain all kinds of accounts, invoices and documents related to relations with third parties (customers, suppliers, other service providers, etc.) in a complete, transparent, accurate, fair and reliable manner,
- b. establish internal control systems to prevent unrecorded transactions and
- c. take measurements to prevent alteration of accounting or similar business records relating to any transaction and falsification of the facts

#### **4.7. Representation and Hosting**

**4.7.1.** Representation and Hosting includes without limitation:

- a. Social Events
- b. Accommodation and
- c. Dinner Invitation

**4.7.2.** Company may carry out representation and hosting activities to improve its commercial relations and to establish a commercial network.

**4.7.3.** Company endeavors to ensure that these activities are reasonable. Company ensures that representation and hosting does not precede a fundamental and important decision-making process.

#### **4.8. Training and Communication**



**4.8.1.** Anti-Bribery and Anti-Corruption Policy has been announced to Company's employees and is constantly and easily accessible through the corporate website.

**4.8.2.** Trainings are organized to raise employee awareness on anti-bribery and anti-corruption.

#### **4.9. External Service Providers and Business Partners**

**4.9.1.** Company does not work with persons and organizations that have negative intelligence on bribery or corruption as business partners, suppliers, etc.

**4.9.2.** Outsourcing companies and business partners are obliged to comply with this policy and other relevant regulations. Company informs these companies and business partners about this policy. Business relationships cannot be established with persons and organizations that do not comply with these rules and other regulations, and existing relationships are terminated immediately.

### **SECTION 5. ROLES AND RESPONSIBILITIES**

#### **5.1. General Manager**

**5.1.1.** General Manager is responsible for the creation, implementation and updating of the policy.

**5.1.2.** General Manager is responsible for the oversight of the effective functioning of the Ethics Board and Internal Audit Department, which are the reporting, investigation and sanctioning mechanisms in case of actual or suspected violations of the principles defined in the Policy.

#### **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 handles the complaints and reports received and initiates necessary investigation.

Should any breach 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 has the right and authority to initiate an investigation regarding an employee who allegedly violate the Policy and to take defense from the employee.

#### **5.4. Disciplinary Board**

**5.4.1.** The disciplinary board, following an investigation by Internal Audit Department has right and authority to:

**5.4.1.1.** suspend or terminate the job contract of the employee who are found out to be in violation, and to exercise its rights in accordance with the Labor Law and applicable legislation.

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

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

#### **5.4. Employees**

**5.4.1.** It is responsible for ensuring compliance with the policies determined by General Manager, 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.

**5.4.2.** Company employees are obliged to act in accordance with the principles defined in the Policy and cannot be forced to act in violation of the Policy under any circumstances. Employees are obliged to report all behaviors and practices in violation of this policy to their managers and/or Ethics Board through the Ethics Hotline.

**5.4.3.** Managers are responsible for ensuring the proper application of the principles in the policy by their employees, subcontractors and their employees and business partners.

#### **Ethics Hotline:**

**E-mail:** [etik@formsunger.com.tr](mailto:etik@formsunger.com.tr)

**Address:** 1. Organize Sanayi Bölgesi 8. Cad. No: 60 38070 KAYSERİ



## **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.

## **SECTION 8. RELATED POLICIES AND PROCEDURES**

Code of Conduct Policy Sustainability Policy