

1. Purpose and Scope

Ulusoy Un Sanayi ve Ticaret A.Ş., by this policy, aims at revealing its view and approach regarding bribery and corruption, making necessary information in order to prevent bribery and corruption in all activities of the company, taking measures and determining responsibility and the rules in this respect.

This policy shall cover all business partners acting on behalf of the company or providing the company with services as well as Ulusoy Un employees.

2. Definitions

Bribery: Providing material and nonmaterial interest to himself/herself or another person directly or indirectly through verbal or written agreement from the other party in order to do or refuse to do any business, accelerate, slow down or stop performance of a business.

Corruption: Abusing the authority owned in terms of the relevant position with the purpose of gaining a personal material and nonmaterial benefit directly or indirectly.

Bribery and corruption can occur in many forms. Cash, commission, social benefits, gift, representation and entertainment, acquitted debt or donation for support outside the forms defined in Ethical Rules can be described as the ways of bribe or corruption

3. Responsibilities

Company is authorized to carry out all required inspections and investigations in respect of the attempts of employees, board members, contracting companies, consultants, representatives or business partners to conduct malpractice related to bribery and corruption; in case of any doubt pertaining bribery and corruption, Company is authorized to implement appropriate sanction and \sanctions in accordance with Turkish Labor Law and Turkish Penal Law and relevant legislations and Company Regulations based upon required inspection and investigation duly conducted by taking present conditions into consideration according to the result obtained.

Board of Directors accepts this policy and provides required conditions for implementation of the same. Board of Directors ensures establishment of required communication channels for notifying the behaviours against the policy and takes required measures in order to ensure privacy and

security of the persons who provides information. They ensure that required inspection and investigations are carried out in case of complaint, notice or allegations.

Employees accept Anti-Bribery and Anti-Corruption Policy and act in accordance with this policy. Managers ensure that the principles in such policy are understood and implemented by the personnel working under the supervision of such managers. Employees cannot be forced by anyone and in any manner to act in violation of this policy. All employees are obligated to notify the actions against this policy and doubtful situations to their supervisors or Human Resources Manager.

4. Principles of Anti-Bribery and Anti-Corruption Policy

Ulusoy Un Sanayi ve Ticaret A.Ş. has realized this policy as part of the sensitivity of business ethics. In addition to the business ethics, since bribery and corruption require legal penalty, employees are expected to act sensitively in implementation of the policy and adopt it as part of their personal duties and responsibilities as being independent of business life.

Company undertakes to carry out its activities fairly, legally and in line with ethical rules by taking clear stance against bribery and corruption

Ulusoy Un has forbidden bribery and corruption and all unlawful and unethical behaviors in all countries where it carries out activities as well as in the country of activity.

Even if the value of the interest is very low or offered but not realized yet, this is deemed to be violation of Anti-Bribery and Anti-Corruption Policy.

5. Issues Regarding Donation and Souvenir

Ulusoy Un has regulated the issues regarding donation, aid and souvenir in detail within the framework of Donation and Aid Policy and Ethical Rules. Ethical Rules and Donation and Aid Policy have been published on the website of the company.

6. Bribery and Corruption Incidents or Suspected Bribery and Corruption

All employees must immediately inform their Managers or Human Resources Manager about bribery and corruption or suspected bribery and corruption events without delay.

Ulusoy Un guarantees that identities and personal details of those persons who report the incidents against legal regulations, ethical rules or policy are kept confidential and –if there is not any intentional or slander incident-such persons shall be held harmless due to such reporting.

7. Sanctions

Anti-Bribery and Anti-Corruption Policy must be adopted and completely implemented by all employees. It should be noted that sanctions such as cancellation of labour contract can be implemented in case of violation of the policy according to the internal regulations and the issue has been regulated in many countries with sanctions also containing prison sentence.