



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

### **Purpose**

The purpose of Anti-corruption and bribery policy is anti-corruption and bribery policy which is located in the code of ethics of Kartal Halı Tekstil San. and Tic. A.Ş. is to reveal.

### **Scope**

#### **Anti-Corruption and Bribery Policy;**

Covers it ; All company employees, including the Board of Directors of Kartal Halı Tekstil San. and Tic. A.Ş. , we purchase goods and services that firms and their employees, suppliers, consultants, lawyers, external auditors who work on behalf of our company, including individuals and entities (business associates)

This Policy; is an integral part of corporate governance principles approved by management and publicly announced by the company's, published business ethics Rules, and by participating in the United Nations Global Compact agree to comply with our policies, human resources practices.

### **Definitions**

#### **Corruption :**

Corruption is because of its location or the person's behavior directly or indirectly during the fulfillment of the required ongoing tasks, gain for the purpose of providing for all kinds of interests demanded that it should be offered, given or should be accepted.

Bribery is , powers and duties, in violation of the ethical rules by considering interests to do a job, to buy, to do, not acceleration : in order to slow down the heat ; provide interest, either directly or through intermediaries, offer or promise, solicitation or acceptance, be mediated to them in such ways as to act contrary to the requirements of the task, or to the requesting party to obtain the benefits

Bribery and corruption can be accomplished in many different ways, among them:

- a)** Cash payments,
- b)** Donations,
- c)** The Commission
- d)** Social rights,
- e)** Gifts, hospitality,
- f)** Other interests , it can be shown.



## **Duties and Responsibilities**

Anti-bribery policy implementation and updating is in the Board of ethics powers, Duties and responsibility.

In this context;

- 1) of the Board of ethics make recommendations to the Board of Directors an ethical, reliable, and controlled in accordance with the law for the establishment of a working environment.
- 2) ethical guidelines to be determined by the Board in accordance with senior management risk assessment and necessary control mechanism to establish
- 3) In case of failure to comply with Policies, rules and regulations notification, investigation, and enforcement mechanisms and determination of the operation is required.

Kartal Carpets, all employees,

- a) Ensure compliance with policies determined by the Board of ethics,
- b) The fields of their activities-related risks effectively manage
- c) Work in a way that is compatible with legal regulations and company practices,
- d) A contrary policy or behavior, activity or practice cases to the ethics committee responsible for the report.

## **Companies That Goods and Services Are Bought and Sold and Business Partners**

The firms goods and services are bought and sold and business partners to ensure compliance with relevant statutory regulations and other policy guidelines are required and work with persons and organizations who violate them will be terminated.

## **Selection Of The Company and Its Business Partners**

Goods and services are bought and sold companies in the selection of business partners; experience ,financial performance, technical competence criteria such as the level of Ethics in conjunction with the fact that you have a positive history in this area is taken into account by Senior valuation. A company with negative or business partners with the intelligence of bribery or corruption, even if the other criteria does not work. This context, the necessary research and evaluations to be performed before entering into any business relationship is primarily the responsibility of senior management. Internal controls ,evaluates whether you have been treated in accordance with such requirements.



## **Agreement With The Company and Its Business Partners**

Positive Intelligence and other agreements and contracts to be made with companies and business partners that meet the criteria;

- a) Ensuring full compliance with policy rules and other applicable regulations
- b) The employees absorb these principles and act accordingly,
- c) Employees to periodically receive training on the policy of providing
- d) About the line of ethics and reporting requirements if you encounter a situation like this do encourage you to make a regular notification and reminder-related conditions shall include. Failure to do so is contrary to policy or in case a situation occurs that cause of the study and in force of the contract to be terminated, shall include the provisions.

## **Our Policies and Procedures**

### **Bribery and Corruption**

Our company bribery and corruption of all kinds is the opposite. To be bribed or to be given for whatever purpose is absolutely unacceptable. Bribery or corruption through the business relationship with third parties who wish to do business with our company should not be continued.

### **Gift**

Gift is a tangible thank contacts or business relations or commercial customers and generally do not require payment of a courtesy given by a product.

Any gift which is given by the company to third parties or publicly offered in good faith and should be offered unconditionally.

In this context gifts can be given and their regarding registration published Code of business ethics is located in the policy of accepting and giving gifts has been made in writing to you.

The gift to be accepted, the same principles apply in these principles and given the financial value is not high, the outside of the gift definitely symbolic gifts should not be accepted.

Also, even though it is in this context, the frequency of supply failure to the acceptance of the gift and by accepting gifts accepted through the supervisor first, require notification to HR and upper management of the company.

### **Facilitation Payments**

People and organizations which are in the scope of this policy, process or secure a routine (obtain permits and licenses, to obtain the document, etc.) process with government agencies, facilitation payments cannot be offered to accelerate.

### **Donations**

Accordingly, the prepared donations and Aid policy, has been approved by management.

Our employees , regardless of their jobs, excluded from our company's Aid policy to support charities with their own collective amounts. However, at this point applies the principles of ethics specified in the code.



## Accurate Record-Keeping

Our company, with accounting and recording system is regulated by legal regulations enforced obligations. Accordingly;

- Third parties (customers, suppliers, etc.) any account relations, billing, and documentation for completeness, accuracy and precision to be maintained and recorded in a reliable manner,
- Any transaction on the accounting of commercial recordings, or similar, tampering and distorting the facts should not be done.

## Education and Communication

Anti-corruption and bribery policy, have been announced to employees of the company and Altasoft document management through continuous and soft, the bottom is easily accessible.

Training is an important element for increasing the awareness of employees. In this context, Human Resources organize training program which all workers have to attend to.

## Notification Of Policy Violations

An employee or a person who acts on behalf of the company acted in violation of this policy or the opinion that if in doubt, should be forwarded to the ethics committee.

In our company, employees are reminded to periodically as policies related to business ethics.

Our company promotes honest and transparent approach and good faith on behalf of the company any employee or a person who acts expressing sincere concern, supports and to keep confidential and statements. No employee has done violation of the ethical rules that the ethics committee believes it is a notification that due not to punishment, shall not be subjected to coercion and be written to the Ethics Committee before purchasing or place in the scope of the task is, therefore, a change can not be made. The person who made the notification, if it is exposed to such a treatment, this must be notified to the ethics committee. Of goods and services firms and for employees and business partners with a regular reminder of the ethical rules if you encounter a situation like this do make the notification, should encourage.

## Policy Violations

Anti-bribery policy to the contrary or in cases that are likely to be the subject examined from the ethics committee and in the case of the determination of inappropriate behavior, apply appropriate sanctions. The companies that bought and sold goods and services or in contracts with individuals and organizations who work on behalf of the company Policy, or contrary behavior, attitude or activity that there is of determining case studies/ contracts terminated unilaterally by the applicable company management with justified reason. In the event of a policy violation, without exception, such provisions shall apply.