

GLOBAL ANTI-BRIBERY AND CORRUPTION POLICY

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Board of Directors



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GLOBAL ANTI-BRIBERY AND CORRUPTION POLICY

INTRODUCTION

We recognize the importance of a consistent, effective, and transparent communication model in achieving global success in line with our corporate objectives. Therefore, we have established a comprehensive Global Anti-Bribery and Anti-Corruption Policy to ensure open, transparent, and trustworthy communication with all our stakeholders.

Through this Policy, we aim to foster an ethical business environment by adopting a preventive approach against bribery and corruption risks encountered in today's business environment.

1. PURPOSE

This Policy defines the principles governing our Company's efforts to prevent and combat harmful practices such as bribery and corruption in our operations and in our relationships with public institutions and private sector organizations at national and international levels.

This Policy forms an integral part of our Global Corporate Compliance Program and is aligned with our other corporate policies, as well as applicable national and international regulations aimed at promoting an honest, transparent, and ethical business environment.

The Policy demonstrates our commitment to protecting and enhancing our reputation and credibility, meeting the expectations of our internal and external stakeholders, and effectively managing compliance risks.

2. SCOPE

This Policy applies to all managers and employees in every country where we operate, as well as suppliers and third parties acting on behalf of our Company.

All business partners are required to meet the ethical standards expected by our Company when providing services or carrying out activities on our behalf.

The rules applicable to our suppliers are defined in our Global Supply Chain Policy.

3. CORE PRINCIPLES

3.1 Anti-Bribery and Anti-Corruption

Principle 10 of the United Nations Global Compact emphasizes that businesses should work against corruption in all its forms, including extortion and bribery.

We conduct our operations in compliance with applicable national and international anti-bribery and anti-corruption laws, regulations, and ethical commitments.

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Our Company strictly prohibits all forms of bribery and corruption, including facilitation payments intended to expedite or secure routine actions, even where such payments are not explicitly prohibited by local law.

All employees are required to comply with this Policy in addition to the legal requirements of the countries in which we operate. Where circumstances indicate a potential violation of this Policy, employees are obligated to report the matter to the Compliance Department.

Compliance with this Policy is the responsibility of all employees, while senior management is expected to demonstrate leadership in ensuring compliance.

In addition to any legal consequences, employees found to have violated this Policy shall be subject to disciplinary measures in accordance with the Company's Disciplinary Regulations. If the violation involves a business partner acting on behalf of the Company, termination of the business relationship may be considered.

In situations not explicitly addressed in this Policy or where uncertainty exists, guidance must be obtained from the Compliance Department before any action is taken.

3.2 Relations with the Public and Private Sectors

We conduct our relationships with public institutions and private sector organizations in accordance with this Policy.

Employees who interact with public officials or representatives of private sector organizations must comply with applicable local laws and Company policies throughout such interactions.

Employees are required to inform their supervisors, compliance officers, and the Compliance Department of any requests for bribes or facilitation payments received during the course of business.

3.3 Individuals and Legal Entities Acting on Behalf of the Company (Business Partners)

All individuals and legal entities acting on behalf of the Company ("Business Partners") must conduct their activities in compliance with:

- Applicable anti-bribery and anti-corruption laws in the countries where they operate;
- This Policy; and
- Our Global Corporate Compliance Program Policy.

We reserve the right to verify whether our Business Partners conduct their activities in accordance with these requirements.

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Where a Business Partner is considered to present a heightened risk, we may conduct a due diligence review. Such reviews may include the collection of information regarding the partner's organizational structure, ownership, management, historical business conduct, and any previous involvement in matters related to bribery or corruption, as well as the assessment of contractual and operational risks and identification of mitigation measures.

Employees requiring support for due diligence reviews should contact the Compliance Department.

Based on the information provided by employees regarding the planned engagement, the Compliance Department will determine the appropriate level of due diligence and inform employees regarding the documentation and information to be obtained from the Business Partner.

Due diligence findings and recommendations, to the extent permitted by the Company's resources and capabilities, will be shared with the relevant employees within a reasonable timeframe. Commercial decisions based on such findings remain the responsibility of the relevant managers.

3.4 Conflict of Interest

A conflict of interest refers to situations in which an employee's personal interests may directly or indirectly interfere with their ability to make objective decisions, assessments, or perform their professional duties in the best interests of the Company.

Employees are required to avoid situations involving personal interests or circumstances that may create the appearance of personal gain.

Further information regarding conflicts of interest is provided in our Global Conflict of Interest Policy.

3.5 Gifts and Hospitality

When making business decisions on behalf of the Company, employees must act solely in the Company's interests and must not prioritize personal interests.

Gifts and hospitality may be used to establish and strengthen business relationships; however, they must be offered and accepted in accordance with established rules and procedures.

No gift or hospitality should be regarded as personal gain. Each offer or acceptance of a gift or hospitality must be carefully reviewed and evaluated before approval.

Detailed rules, limits, and approval requirements relating to gifts and hospitality are set out in our Global Gifts and Hospitality Policy.

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3.6 Donations and Sponsorships

We support donations and sponsorship activities that contribute positively to the social well-being of the communities in which we operate.

In accordance with our commitment to transparency, we define the approvals required before undertaking donations and sponsorships and provide guidance regarding prohibited activities.

We do not engage in donations or sponsorships that may violate laws, damage our reputation or brand value, or create conflicts of interest.

All donations made by the Company are intended to create positive social impact and must not involve any expectation of improper advantage or benefit. Sponsorship activities must align with the Company's branding and strategic objectives.

We avoid donations and sponsorships that could be perceived as attempts to obtain improper benefits or that may pose a risk to the Company's reputation and image.

Further details regarding donation and sponsorship rules and approval procedures are set out in our Global Donations and Sponsorships Policy.

4. . REPORTING OF NON-COMPLIANCE

Any conduct inconsistent with this Policy should be reported through the following communication channels:

- Email: etik@aksa.com.tr
- Ethics Hotline: +90 850 511 11 12

5. QUESTIONS AND CONSULTATION

Questions and requests for guidance regarding the implementation of this Policy may be directed to the Compliance Department at:

- uyum@aksa.com.tr

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