



ANTI CORRUPTION AND ANTI BRIBERY POLICY

As Akten Kozmetik San. Ve Paz. A.Ş., in accordance with our Anti-Bribery and Anti-Corruption Policy, we are committed to complying with applicable laws, operating in a manner consistent with our Company Values, Ethical Behavior Principles, and Implementation Guidelines, and ensuring integrity by applying our Anti-Bribery and Anti-Corruption Policy.

Our Anti-Bribery and Anti-Corruption Policy covers all employees and managers of our company, including our affiliates and subsidiaries, as well as agents, clients, distributors, suppliers, contractors, and all other parties we do business with.

This policy is an integral part of the company's business ethics rules approved by the Board of Directors, as well as the Social Compliance and Human Rights policies and Human Resources practices to which we are committed.

- As a company, we adopt a zero-tolerance commitment towards bribery and corruption and do not accept any form of bribery or corruption, whether direct or indirect.
- The company is opposed to all forms of bribery and corruption. Accepting or offering bribes is absolutely unacceptable, regardless of the intended purpose.
- Business relationships with third parties who seek to engage with the company through bribery or corruption should not be maintained.
- No tolerance is shown for any acts of bribery or corruption in the commercial relationships of our employees and/or third parties with our company.
- Any gifts offered or given should be presented openly, in good faith, and unconditionally. The principles regarding acceptable gifts and their recording are outlined in the Gift Acceptance and Giving Principles, which are documented in the Code of Business Ethics.
- Any gifts that our company wishes to give to third parties should be presented openly, in good faith, and unconditionally. In cases of conflict of interest, gifts should neither be offered nor accepted
- In accordance with our company's Ethical Principles, an employee should avoid any situation or interest that could create a conflict of interest or put them in a position of conflict with the organization
- In procurement operations, areas of primary risk include supplier selection, maintenance on the approved list, tenders, and cash basis suppliers. Our suppliers, subcontractors, consultants, customers, employees, and all potential business partners must not be listed on national or international Restricted Persons lists. We do not engage with companies against which there is negative intelligence related to bribery or corruption. The responsibility for conducting necessary market research before commencing any engagement lies with the relevant process manager. Individuals acting on behalf of our company and its affiliates, such as suppliers, distributors, and contractors, must agree to comply with legal regulations as well as our anti-bribery and anti-corruption policies and programs.
- In the event of any suspicion that bribery has been received and/or given, a thorough investigation and review will be conducted. Based on the results of this investigation, and taking into account the current conditions and circumstances, appropriate sanctions and/or measures will be applied in accordance with the Turkish Labor Law, Turkish Penal Code, related regulations, and Company Policies.
- Reporting Bribery and Corruption; All incidents and situations related to bribery and corruption should be reported to the Ethics Committee via email or through the online reporting system on the company's website.

Additionally, "Information Security Incidents," "Smuggling," "Misconduct," "Organized Crime," "Other Customs-Related Security Violations," and "Non-Customs-Related Security Violations" should be reported through our Misconduct and Security Violations website and hotline