

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Purpose and Scope

1.1. With the Anti-Bribery and Anti-Corruption Policy, Norm declares its commitment to the principles of prevention of bribery and corruption, compliance with relevant anti-bribery laws, and aims to establish a guide for the identification and prevention of possible bribery and corruption activities in order to protect its reputation and integrity.

1.2. This policy covers all employees of the companies within Norm Holding.

2. Definitions

2.1. Bribery: Giving/receiving or offering or undertaking to give/receive anything of "value" for the purpose of obtaining an improper benefit or undue influence in a business transaction or relationship.

2.2. Business Courtesy: It refers to all kinds of gifts and hospitality (meals, travel, entertainment) provided for business purposes or in connection with an event carried out within the scope of a business.

2.3. Charitable Contributions: It refers to voluntary contributions made in cash or non-cash to any organization without expecting any benefit.

2.4. Facilitation Payment: An informal, improper, low-value payment that expedites a routine service, made to secure or expedite the payer's legal operations.

2.5. Types of Benefits: The types of benefits that can be provided to facilitate bribery transactions include, but are not limited to, the following:

2.5.1. Gifts and Hospitality

2.5.2. Recruitment of family members of state officials (most relevant laws and regulations considers this bribery)

2.5.3. Donation - it must be made without the intention of influencing any current or future business-related decision of the recipient of the donation.

2.5.4. Sponsorship - Sponsorships may be used to obtain an improper benefit.

2.5.5. Other Benefits - tickets to sports activities, discounts, samples, free products, as well as other trade and sales programs can be given as examples of other benefits.

2.5.6. Borrowed or loan value relationship; debt or loan relationship entered into with third parties in subordinate-superior relations or with third parties doing commercial business with the organization.

3. Rules

3.1. Gifts, Meals, Travel, and Hospitality:

It is strictly prohibited to provide or accept gifts, meals, travel, or hospitality for the purpose of improperly influencing any party, in particular a government official, in order to obtain an unfair advantage. Giving a gift to a public official or accepting a gift given by a third party can be permitted under certain specific conditions set out in the Gifts and Hospitality Policy.

3.2. Recruitment of Government Officials or Interaction with Government Officials: Recruitment decisions must be based on competency and these decisions must not inappropriately affect public officials. If a well-known family member or a public official applies for a job to work within Norm, the necessary approvals must be obtained before proceeding to the recruitment process.

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Public officials can be hired or assigned to serve the legitimate commercial purposes of Norm if the following conditions are met;

- 3.2.1. The must be no expectation from Norm to obtain a commercial advantage from the public in exchange for the hiring of the relevant person by Norm,
- 3.2.2. The person(s) must be objectively qualified to meet the necessary criteria for the relevant position,
- 3.2.3. The salary or wages must be at a reasonable level, compatible with the job and the professional qualifications of the person concerned,

3.3. Grants and Donations:

The provision of grants/donations in exchange for inappropriately influencing a public official or obtaining an improper benefit for a public official is prohibited under this Policy.

Likewise, it is prohibited to provide grants/donations to or accept from suppliers, customers, and other third parties with whom Norm has a commercial relationship. Such benefits can only be made due to the marketing activities carried out by the company as an enterprise, and CEO approval is required.

3.4. Third Party Relations:

The applicable anti-bribery and anti-corruption laws do not allow any improper payments made directly by Company employees or indirectly through an agent, consultant, distributor, or other third-party representative (collectively, "third parties") acting on behalf of Norm.

Third parties must act in accordance with this Policy under all circumstances. In order to reduce the risk of bribery and corruption, risk-based due diligence studies must be carried out for third parties both before the business relationship and during the business relationship. In order to reduce the risks related to corruption, risk-based due diligence studies must be carried out on possible partnerships, acquisition targets, and other strategic investments.

The Norm establishes a business relationship with third parties only;

- 3.4.1. If there is a legitimate business need for the services or products supplied,
- 3.4.2. If the price of the services and products to be provided is not above the market value,
- 3.4.3. If the due diligence study conducted on the third party with the perspective of bribery and corruption results positively.

A business relationship must not be established with third parties who have any influence on public officials or who are considered to be able to influence public officials in any way without a detailed examination of their background, qualifications, and reputation on behalf of Norm. Agreements with third parties acting on behalf of Norm must be regulated in accordance with all applicable anti-bribery and anti-corruption laws.

It is forbidden for our employees to enter into personal debt/credit relations with any third party that has a commercial relationship with Norm. When such a situation arises, sanctions may be imposed against the relevant employee depending on his/her influence to impact the commercial relationship

3.5. Debt/Credit Relations Within the Institution:

The debt/credit relationship to be established within the norm employees must not be realized contrary to the ordinary course of life. If the debit/credit relationship becomes continuous, creates unrest for the parties of the relationship, and one of the parties has control and management responsibility over the other, this may be contrary to the interests of the institution and cause conflicts of interest.

4. Enforcement and Implementation

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

- 4.1. All employees and managers are responsible for controlling the compliance of daily operations and activities with this policy.
- 4.2. The policy can be revised if deemed necessary. All revisions shall be published by Human Resources with the approval of the Board of Directors after the evaluation of the Executive Board by obtaining the opinions of the Ethics Committee and the Internal Audit Department.