

## ANTI CORRUPTION AND BRIBERY POLICY

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As a company, Sarten Ambalaj Sanayi ve Ticaret A.Ş. makes significant efforts to establish and uphold integrity, which is one of its most valued assets.

Compliance with and prioritization of anti-corruption and anti-bribery laws, both in Turkey and globally, are among our core values.

Sarten Ambalaj Sanayi ve Ticaret A.Ş. considers bribery to be any item of value offered or received to influence a business decision involving the company or to gain an unfair advantage.

This includes attempts to secure new business, retain current business, or obtain any improper advantage at any of the company's factories or units.

Bribery is legally prohibited in Turkey and in all countries where we conduct business.

Sarten Ambalaj Sanayi ve Ticaret A.Ş. is committed to complying with all anti-bribery and anti-corruption measures.

It is prohibited for any employees, officers, managers, or third parties acting on behalf of Sarten Ambalaj Sanayi ve Ticaret A.Ş. to offer or accept anything that could be considered a bribe.

The company does not give or receive bribes, either directly or indirectly, and does not pursue inappropriate means to gain commercial or financial benefit.

Our employees must not accept or offer gifts, money, checks, etc., that constitute or could be interpreted as a bribe.

Any intent or request involving bribery or other improper means must be rejected and reported to senior management.

Employees are also prohibited from using their position for personal gain or to benefit others.

If bribery or corruption is identified, the company's internal regulations, disciplinary procedures, and legal provisions will be applied to all employees of Sarten Ambalaj Sanayi ve Ticaret A.Ş.

Anti-corruption laws apply to:

Anyone who approves a bribe payment,

Those who issue or accept fake invoices, delivery notes, or goods acceptance/dispatch documents,

Individuals who send email instructions related to bribe payments,



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Anyone who conceals, covers up, or knowingly cooperates in bribery activities.

Anti-bribery and anti-corruption controls at Sarten Ambalaj Sanayi ve Ticaret A.Ş. are under the responsibility of the senior management of each factory and are monitored and audited by the Internal Audit Department at headquarters.

This Personnel Regulation is explained to all new employees through training and is also provided in written form.

All employees of Sarten Ambalaj Sanayi ve Ticaret A.Ş. are responsible for complying with the stated rules and are also obliged to report any violations.

GENERAL MANAGER
SARTEN PACKAGING