

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

As Smart Güneş Enerjisi Teknolojileri Araştırma Geliştirme Üretim Sanayi ve Ticaret A.Ş. ("Company"), we conduct our activities in a fair, equal, accountable, transparent and ethical manner, and adopt the zero tolerance approach against bribery and corruption as a principle. Our Anti-Bribery and Anti-Corruption Policy, which we have prepared with this principle is an indicator of our company's determination to fight corruption and bribery, determines the principles followed in our company, and ensures that the relevant parties act in accordance with universal rules, professional and ethical principles. Within the framework of our Anti-Bribery and Anti-Corruption Policy, which covers both our company's employees and all our stakeholders;

- We conduct all our activities in accordance with ethical standards.
- We consider the main risk areas where bribery and corruption can occur; gifts and entertainment events, donations and sponsorships, facilitation payments, outsourcing companies and business partnerships, as abuse of title or duty, and we stand against any action that may lead to bribery and corruption in all our processes.
- We act in accordance with ethical standards in gifts and entertainment.
- We do not offer or accept hospitality offers or gifts that may cause or cause a conflict of interest.
- Except for the symbolic gifts given in gift acceptance, we do not accept gifts of big value that may create obligations.
- We do not allow any person or entity to offer facilitation payments, make personal payments, charitable contributions or donations within our company.
- We undertake that company donations or sponsorships will comply with legal regulations and the company's own regulations.
- We do not allow our company employees to engage in activities that will result in gaining benefits for themselves, their families or third parties under any name, by abusing their office, by mutual agreement, deception or coercion.
- We ensure that the companies we outsource services comply with the legal regulations and all applicable anti-corruption laws.

This Anti-bribery and Anti-Corruption Policy was adopted and put into practice with the Board of Directors Decision No. **2022/46** dated **23/11/2022**. The policy is regularly reviewed and updated when deemed necessary.