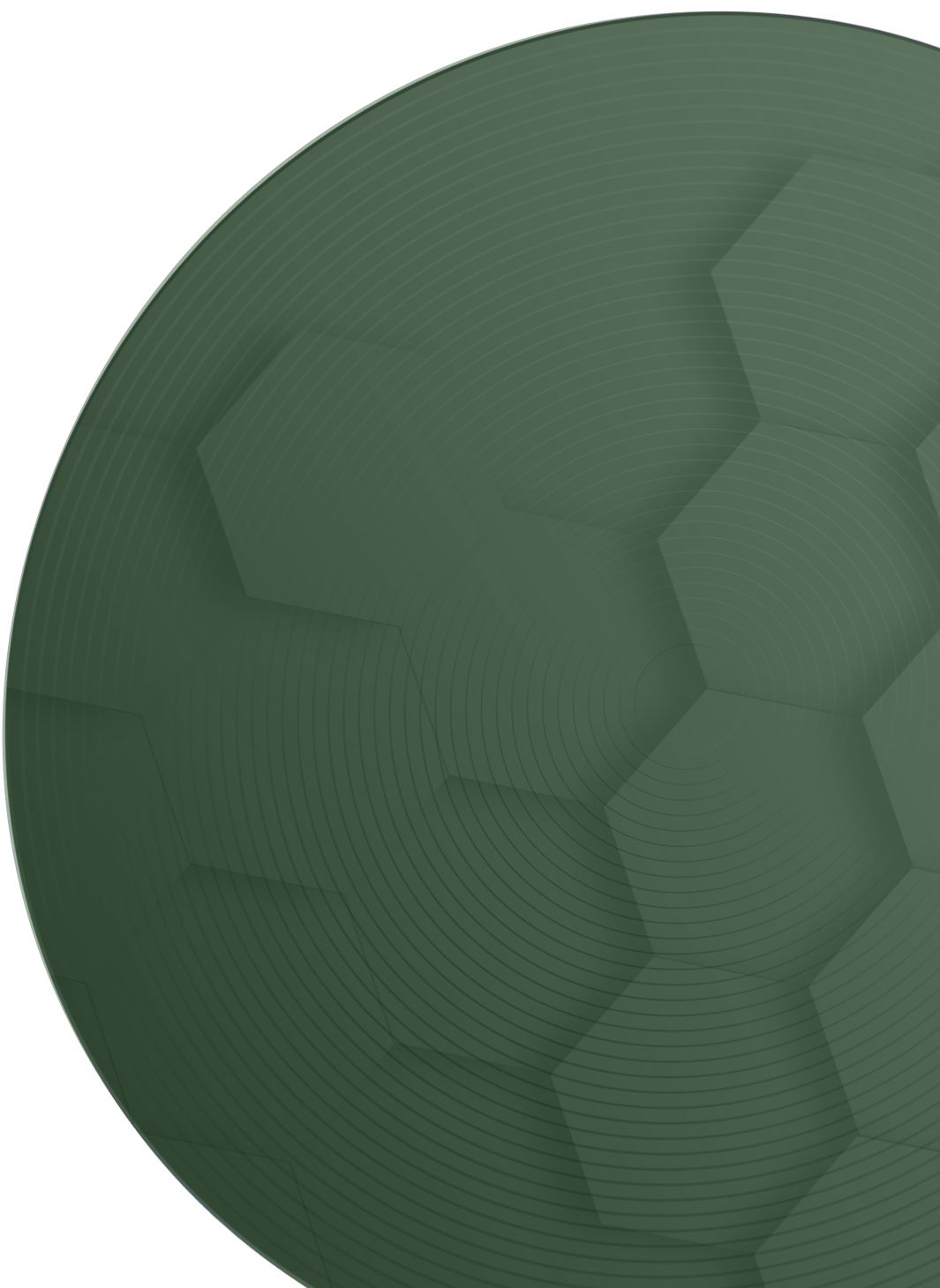


Anti-Bribery and Corruption Policy



Purpose and Scope

BozBros is firmly committed to the principles of honesty and transparency in all its activities. Fighting bribery and corruption is one of the core values of our company. This policy has been established to define the rules and responsibilities regarding anti-bribery and anti-corruption measures for BozBros employees, suppliers, contractors, representatives, and other business partners. This policy applies to all employees, managers, contractors, consultants, business partners, and third parties associated with BozBros. Our main goal is to ensure full compliance with all local and international anti-corruption laws wherever our company operates.

General Principles

BozBros conducts all its activities according to the highest ethical standards and adopts sustainable business practices as a fundamental principle. As a participant in the United Nations Global Compact, our company is strongly committed to the principle of "standing against all forms of corruption" and embraces all ethical guidelines outlined in the UN Global Compact.

In all business processes and relationships, BozBros ensures the complete implementation of these principles. Beyond compliance with local regulations, BozBros and its business partners will not offer or accept any form of bribe, corruption, facilitation payments, or improper gifts. No employee may offer, solicit, or permit such activities either directly or indirectly through third parties or business partners.

Violation of anti-bribery and anti-corruption laws can have serious consequences for Bozalıođlu Orman Ürünleri A.Ş., including administrative or criminal penalties for company executives, employees, and business partners. Such violations may lead to license revocation, asset seizures, and most importantly, damage to the company's reputation.

Any breach of this policy by an employee will result in severe disciplinary actions, including termination of employment. Additionally, actions found to be in violation of applicable laws will be reported to the relevant legal authorities by the compliance unit.

Policy Implementation

Third Parties and Due Diligence

To prevent the risk of bribery and corruption, BozBros conducts a detailed due diligence process for all transactions with business partners. The concealment of any improper transactions under terms like "commission" or "consultancy fee" is unacceptable.

Before entering into any business relationship with a partner, BozBros ensures the following conditions are met:

- A thorough due diligence investigation of the business partner yields positive results.
- Protective clauses necessary for compliance with anti-bribery and anti-corruption laws are included in all contracts.
- The true nature of the transactions is not concealed, and no unusual contract terms (e.g., payment terms significantly different from market conditions) are

Gifts and Hospitality

BozBros requires that all gifts and hospitality received from or given to third parties comply with the following criteria:

They must comply with anti-bribery and anti-corruption laws.

- They must not be in the form of cash or cash equivalents.
- They must be appropriate for the recipient's position and the circumstances.
- They must be properly and transparently recorded in accounting records.
- Acceptance or use of any gift exceeding USD 100 requires written approval from the relevant management, and it is only permitted when it is impractical to return the gift or if doing so would negatively impact the business relationship.
- The frequency of gifts must not create undue influence or lead to a perception of corruption.
- In case of any uncertainty, employees must consult the relevant department or compliance officer.

Donations to Political Parties

BozBros prohibits donations or contributions in cash or in kind to any political party, political candidate, or political group on behalf of the company.

Sponsorships and Donations

BozBros strictly forbids the promotion of corruption through sponsorship or donations in exchange for improper benefits to public officials, political influencers, or other third parties.

Donations and sponsorship activities are carried out solely for the purpose of providing social benefits.

Facilitation Payments

BozBros has zero tolerance for facilitation payments. Employees or business partners may not make such payments to expedite or facilitate any business process on behalf of the company. All transactions must be conducted legally, ethically, and transparently.

Employment and Business Relationships with Public Officials/Political Figures

Employment and business relationship decisions must be made ethically and transparently, and never used as a method to encourage corruption or gain improper advantages with public officials or political figures.

BozBros ensures that before establishing business relationships or making employment decisions involving such individuals, detailed research is conducted to confirm whether the individual holds public office or political influence. This research includes internet and media screenings as well as other databases.

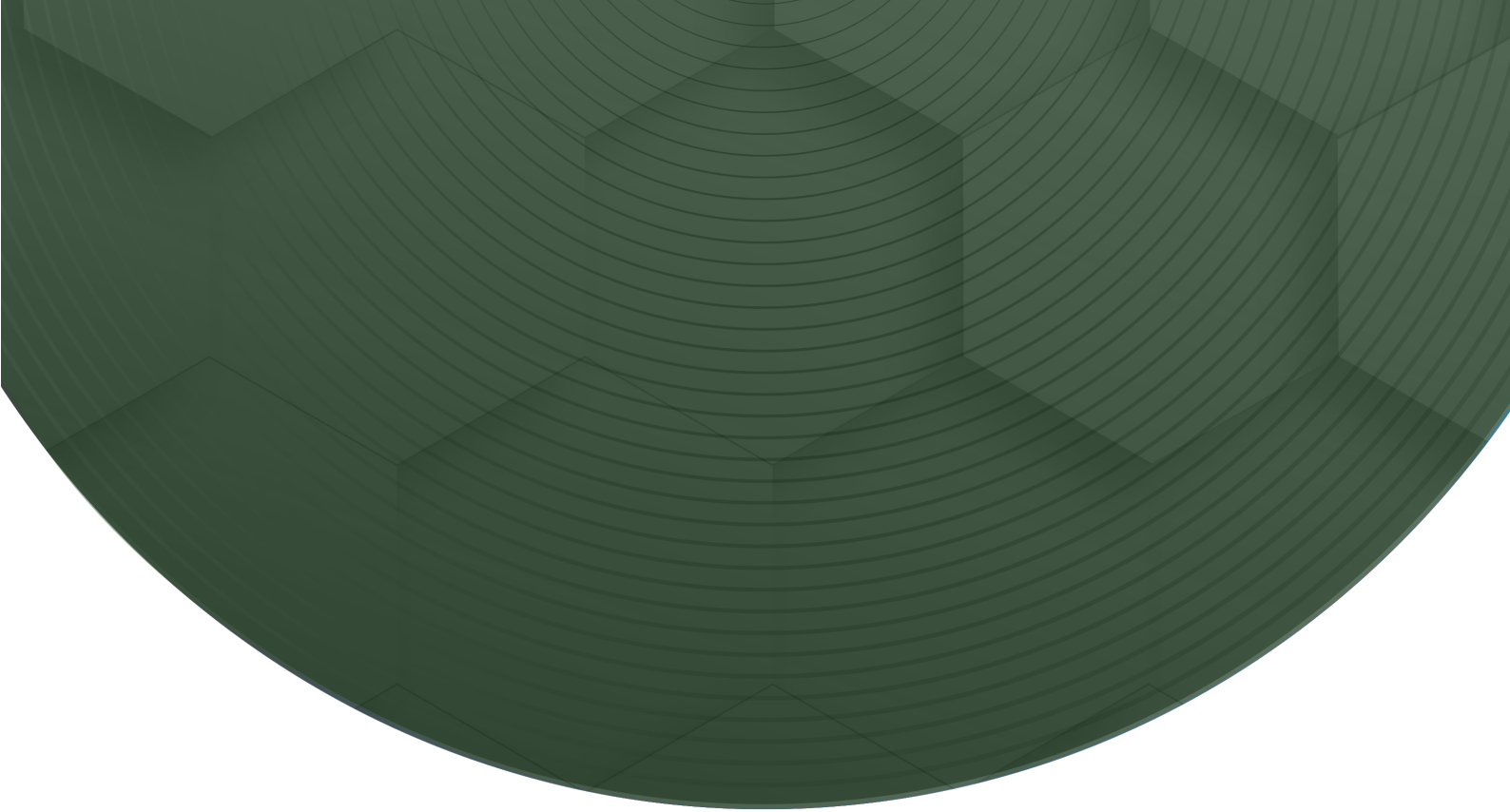
Employment or business relationships with these individuals are subject to the following conditions:

- A comprehensive Enhanced Due Diligence (EDD) is conducted by the compliance department, and any compliance risks are reported to the General Manager.
- The relationship or employment serves a legitimate purpose, is regularly reviewed, and necessary precautions are taken.
- Employment decisions must not give the impression that the individual was hired for improper benefits or illegal activities.
- The person must objectively possess the required qualifications for the position.
- Compensation and other payments must align with the requirements of the job and the individual's qualifications.

Training and Monitoring of Transactions

BozBros provides regular anti-bribery and anti-corruption training for its employees and monitors transactions. In this regard:

- Anti-bribery and anti-corruption training is provided annually to all employees.
- Policies and procedures are adapted according to the company's needs, and necessary updates are made.
- The compliance department regularly reviews the policy and training content and monitors the completion of the training.



BOZ/Bros
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