

COMPLIANCE

**GIFT AND
HOSPITALITY
POLICY**

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1. APPLICATION

This Policy sets out the rules applicable to Egebant employees, their family members and relatives, and third parties who are affected by Egebant's activities or whose activities may affect Egebant, including but not limited to non-governmental organizations, media, employees, partners, stakeholders, suppliers, dealers, and consultants.

All employees and managers of Egebant are obliged to act in accordance with this Policy. Egebant also expects all business partners and suppliers to comply with the principles set forth in this Policy.

Approvals and adequate explanations related to gift and hospitality activities must be properly documented, and related transactions must be accurately and transparently recorded in the books and records.

2. GENERAL PRINCIPLES

In limited circumstances, gifts and hospitality may be acceptable for the purpose of strengthening or maintaining business relationships.

This Policy applies to:

- The giving or receiving of gifts (personal gifts are outside the scope of this Policy) by Egebant employees to/from third parties within the scope of business relationships;
- The invitation by Egebant employees, on behalf of Egebant, of individuals who are not Egebant employees to hospitality events (personal events or hospitality among Egebant employees are outside the scope of this Policy), or acceptance of invitations to hospitality events by Egebant employees from non-employees when acting on behalf of Egebant.

In certain cases, meal invitations, acceptance of meal invitations, small company events, and offers of tickets to sports or cultural events may be acceptable provided that they are infrequent and do not exceed a certain monetary value. Dealers may be invited to sports activities sponsored by our brand. In such cases, invitations must be in the nature of rewards, and the list of invitees must be shared with the relevant department manager prior to the event.

However, if gifts, hospitality, or travel are frequent or high in value, they may give rise to potential conflicts of interest or be inconsistent with local and global laws and regulations. Therefore, providing or accepting gifts and hospitality to/from third parties is permitted only where no benefit is expected in return and no such impression is created, where such activities are accurately and transparently recorded in the books and records, and where they are in line with generally accepted business practices and applicable laws.

When establishing gift and hospitality relationships with third parties, including but not limited to customers and suppliers, the following criteria must be observed (if necessary, please refer to the section on Relations with Government Authorities, Public Officials, and Politically Exposed Persons):

Gifts/hospitality must not be in the form of cash, cash equivalents, services, or promises of business.

Decisions to offer or accept gifts or hospitality must not:

- Influence Egebant's business decision-making processes;
- Be designed to improperly induce an individual to act inappropriately within the scope of Egebant's business activities;
- Affect, or create the perception of affecting, Egebant's relationship with a third party
- Impair Egebant's independence, performance, or ability to make objective decisions;
- Be provided for the purpose of securing improper financial benefits, favorable tax treatment, or obtaining or retaining business, whether for Egebant or for a third party.

Gifts or hospitality, and their nominal value, must not:

- Be prohibited by laws and regulations, including but not limited to those set forth in the Anti-Bribery and Anti-Corruption Policy (with respect to bribery, facilitation payments, and improper payments);
- Harm the integrity or credibility of Egebant's business relationships with third parties;
- Damage Egebant's reputation if publicly disclosed;
- Be given or received during a tender or competitive bidding process;
- Be perceived as a bribe, facilitation payment, or commission;
- Constitute consideration for preferential treatment in the performance of a specific duty.

3. GIFTS

When giving or receiving gifts, the relevant managers must be informed in all cases. Gifts must be acceptable on behalf of the Company.

a. Monetary Limit for Gifts: When giving or receiving gifts, employees must ensure that the value of the gift does not exceed the limit determined by management from a single source and that it is a one-time occurrence (no more than once per year) and not provided on a regular basis.

Any gift that may adversely affect fair and impartial decision-making or that may be considered contrary to generally accepted business practices must be refused regardless of its monetary value, even if it is below the specified limit. Accepted gifts must be reported to the Human Resources Department.

¹ See Egebant Anti-Bribery and Anti-Corruption Policy.

² "Single source" includes all related parties, including but not limited to customers, suppliers, authorized representatives, managers, and the employees of such parties.

b. Acceptance of Gifts Exceeding the Limit: If an employee is offered a gift exceeding the limit determined by management, the employee must not accept the gift under any circumstances. The gift must be declined by reminding the counterparty of the Gift and Hospitality Policy.

c. Giving Gifts Exceeding the Limit: If it becomes necessary to give a gift exceeding the specified limit (that does not have commercial value), employees must obtain prior approval from the General Manager.

4. HOSPITALITY

a. General:

Hospitality may sometimes play an important role in strengthening relationships with third parties. Egebant employees may offer or accept hospitality that arises within the scope of permitted business purposes such as goodwill building and improvement of business relations.

Hospitality may be offered or accepted only if it is:

- Infrequent (e.g., participation in sports, theater, or cultural events);
- Not a bribe or facilitation payment;
- Not creating the perception that the provider is entitled to preferential treatment or discounts;
- In compliance with the limits specified in this Policy, unless lower limits are set by local laws and regulations.

b. Prohibitions:

The following types of hospitality must never be accepted from or provided to third parties:

- Hospitality that may be perceived as excessive under business standards;
- Activities that are inconsistent with Egebant's Code of Business Ethics and Related Policies or with the culture of the country where the gift or hospitality is given or received;
- Hospitality that may result in non-compliance with local or national laws and regulations of the relevant country;
- Hospitality that an objective third party would consider excessive;
- Hospitality that provides personal benefit or interest, including participation of family members, relatives, and/or close associates;
- Hospitality exceeding the limits defined under this Policy, unless otherwise permitted by local laws and regulations.

c. Record Keeping:

Employees must maintain records for audit purposes and must ensure that records of any hospitality provided on behalf of Egebant or received by Egebant include the names of participants and the organizations they represent.

Employees engaging in hospitality activities must submit supporting documents to the Accounting Department for retention.

d. Approval:

Prior to the hospitality event, approval must be obtained from the direct manager via the Company email system. If the hospitality exceeds the defined limits, approval from the next-level manager must also be obtained.

5. EXCLUDED GIFTS

Across Egebant, it is customary to offer or accept low-value promotional items such as calendars, branded merchandise, or keychains to/from certain suppliers, customers, and other third parties within the scope of business activities, provided that their total value does not exceed the specified limits. It must be confirmed that such gifts are not intended to influence, or create the perception of influencing, an employee's professional judgment or decisions.

Egebant employees may give or receive gifts to/from third parties provided that:

- They do not create the perception that the gift-giving party receives special or preferential treatment, advantageous pricing, or offers;
- They are not used for personal interests involving family members, relatives, or close personal relationships.

Employees must consume edible gifts in the workplace and share them with team members. Flowers are outside the scope of this Policy.

6. RELATIONS WITH GOVERNMENT AUTHORITIES, PUBLIC OFFICIALS, AND POLITICALLY EXPOSED PERSONS

As many of the countries in which Egebant operates prohibit the provision of items of value to Public Officials and Politically Exposed Persons for the purpose of obtaining or retaining business, utmost care must always be exercised in this regard.

A gift or hospitality may be provided to a public official only if all of the following conditions are met:

- The transaction is in compliance with local laws and regulations;
- The gift or hospitality is not perceived as a bribe or improper payment;
- The reason for offering the gift or hospitality is clearly defined and documented, including approval by the General Manager;
- The value and frequency of the gift or hospitality are symbolic and not excessive;
- The transaction is properly recorded in the accounting books and records.

3 "Public Official" is broadly defined to include various individuals, including but not limited to:

- Employees of government bodies (such as civil servants, police officers, etc.);
- Employees of state-owned or state-controlled enterprises;
- Employees of political parties and political candidates;
- Individuals holding legislative, executive, or judicial office in a country;
- Individuals performing public functions for a country;
- Judges, jurors, or other judicial officials working in international or supranational courts or in the courts of a foreign state;
- Members of international or supranational parliaments, and individuals performing public duties for a foreign country, including those working in public institutions and organizations;
- Domestic or foreign arbitrators appointed to resolve a legal dispute;
- Officials or representatives working for international or supranational organizations established under an international agreement.

4 "Politically Exposed Persons (PEPs)" means individuals who currently hold or have previously held prominent public functions, including senior politicians; senior officials in administrative or judicial bodies and/or the armed forces; senior executives of state-owned enterprises; individuals holding significant positions in political parties; senior managers working in international organizations; and individuals holding positions equivalent to those listed above, as well as all family members and persons known to be close associates of such individuals.

7. DUTIES AND RESPONSIBILITIES

Egebant is responsible for ensuring that all employees and all third parties comply with this Policy in their relations with Egebant and shall take the necessary measures in this regard. Violation of this Policy by an employee may result in serious disciplinary actions, including termination of employment. If any third party expected to comply with this Policy acts in violation thereof, the relevant contracts may be terminated. In case of any conflict between this Policy and the local legislation applicable in the countries where Egebant operates, the more restrictive provision shall apply, provided that it does not conflict with local law.

In addition, the Company's position regarding corrective and/or preventive actions against non-compliant conduct must be regularly evaluated through relevant parties.

If you become aware of any act that you believe violates this Policy, applicable laws, or Egebant's Code of Business Ethics, you must report it through the Company's ethics channels listed below:

Ethics WhatsApp Line

Via the ethics form at: <https://www.egebant.com.tr/tr/kurumsal/etik-form>

Compliance Officers are employees appointed by the General Manager who are responsible for monitoring the Company's activities related to this Policy.