

Anti-Bribery and Anti-Corruption Policy

1. Purpose and Scope

The aim of the Sertrans Anti-Bribery and Anti-Corruption Policy is to ensure compliance with the anti-bribery and anti-corruption legal regulations, ethical principles and other relevant international standards in the areas where company employees operate. As a company, we adopt a zero-tolerance policy against bribery and corruption.

Anti-Bribery and Anti-Corruption Policy of our Company

- All company employees, including the Board of Directors,
- companies from which we acquire outsourcing services as well as business partners and their employees are included.

This policy is an integral part of internal processes and legal regulations.

2. Definitions

Corruption; Requesting, offering, granting or accepting bribery or any other kind of fraudulent benefit which may lead to deviations in the proper performance of the duties or acts that are carried out by the person providing the bribery or ensuring an illegal benefit directly or indirectly due to his or her position.

Bribery, on the other hand, is the benefit of a person within the framework of an agreement he has reached with a third party in order to act contrary to the requirements of his duty by doing, not doing work, accelerating, slowing down procedures.

Bribery and corruption can take place in many different ways and areas:

- Gift
- Donations
- Hospitality policy
- Outsourced companies and business partners
- Facilitating payments

can be counted as examples.

3. Duties and Responsibilities

The implementation and updating of the policy will be carried out by assignments made by the Board of Directors.

Within the scope of the Anti-Bribery and Corruption Policy, the necessary process, system and organizational structure have been established in our company to comply with legal regulations and ethical principles, and the relevant duties and responsibilities have been put in writing. Accordingly;

- Regulating and changing the ethical principles is under the authority of the company's board of directors, and disciplinary action is taken if company personnel act in violation of these principles.
- Managers of all units of our company are responsible for taking relevant measures within the framework of their field of duty in order to evaluate potential risks, to ensure compliance of employees, outsourcing companies and business partners with the policy principles.

- Our company employees are responsible for complying with the policies determined by the senior management, carrying out the duties determined by the legal legislation and the company's duty regulations within the scope of their authorities and working in harmony.

4. Bribery and corruption

The company is determined to comply with the relevant laws, regulations and principles, as well as to stand against all kinds of bribery and corruption. Receiving or giving bribes for whatever purpose is absolutely unacceptable.

It is essential not to continue business relations with third parties who want to get service from the company through bribery.

5. Major Risk Areas for Corruption Actions

In our company, the measures taken to ensure an effective fight against bribery and corruption are determined by considering the sensitivity of the positions of the current employees or their access levels.

a) Gift

A gift is a product that does not require any monetary payment and is generally given by people or customers with whom we have business relations as an appreciation or business courtesy. All kinds of gifts given to third parties by the company are offered in good faith. Although the same conditions apply for the acceptance of the gift and in accordance with these conditions, no gifts are accepted except for the symbolic gifts that are not of high material value and given to the company, not to the personnel.

Even if it complies with the issues specified in the policy, gifts are not offered or accepted in such cases in order not to cause situations that may cause or perceive a conflict of interest.

b) Donation

It is essential that no corporate or personal payment, gift, aid or donation is made to any private company, government official or political party candidate in order to affect any decision related to the continuation of the company activities or the service procurement and efficiency that may be for the benefit of the company.

c) Hospitality policy

Hospitality may be offered to third parties to develop commercial relationships and to establish normal commercial communication networks. These third parties may include customers, consultants, lawyers, auditors and other companies that have business relations with the company. Hospitality offered by the company is offered openly and unconditionally in good faith.

Even if it complies with the issues specified in the policy, hospitality offers are not offered or accepted in such cases in order not to cause situations that may cause or perceive a conflict of interest.

d) Outsourced companies and business partners

Outsourced companies and business partners, including support services, are required to comply with the policy principles and other relevant regulations. Work with persons and organizations that act against the Anti-Bribery and Corruption Policy shall be terminated. In the selection of foreign service companies and business partners, it is also considered that they have a positive history apart from ordinary technical criteria and that they have policies that are equivalent to our company's policies and ethical principles. In addition, it is also checked whether the payments to be made as a result of outsourcing are legitimate and proportional to the service.

e) Facilitating payments

The company does not allow individuals and organizations covered by the policy to offer facilitation payments to secure or accelerate their routine work or process.

6. Error-free Record Keeping

The matters that the company has to comply with regarding the accounting and recording system are regulated by legal regulations, ethical rules and working principles, and within this framework, all kinds of accounts, invoices and documents belonging to third parties (customers, suppliers, etc.) must be properly recorded and retained, no falsification of the accounting or similar commercial records pertaining to any transaction, and no distortion of the facts are acceptable.

7. Training

The Anti-Bribery and Anti-Corruption Policy has been announced to all employees. Trainings are organized in order for the personnel to adopt the principles in the said policy and to continue their work in accordance with these principles.

8. Reporting Situations and Behaviors Contrary to the Policy

Company employees or persons acting on behalf of the company immediately inform the human resources department or directly communicate such situation to the human resources department or directly inform about the persons and institutions that violate this policy in the transactions they encounter, or any situation that violates these rules to the www.sertrans.com.tr address or by calling 0850 288 81 81. Notifications are kept completely confidential. During the examination and investigation to be made after the notification, maximum attention is paid to the confidentiality rules and primarily, the personnel who make the notification are not harmed.

9. Supporting and Protecting Personnel Acting in Compliance with the Policy

Company personnel who operate the rules on prevention of bribery and corruption; He/ she undertakes that he/ she will not suffer any harm from acting in accordance with these rules, that he/ she will protect the personnel acting in accordance with the policies in all circumstances and conditions and that the notifications made to human resources on this matter will be kept confidential.

10. Sanction

In case of violation of the Anti-Bribery and Corruption Policy, disciplinary penalties that may lead to the termination of the employment contract, depending on the nature of the incident, come into question. In cases that are contrary to this policy, the issue is examined by the human resources department and senior management, and necessary sanctions are applied in accordance with the legislation in case of detecting non-compliant behaviors.

If requested, the relevant procedures, work instructions and policies are delivered to you by the company official.

We hereby undertake to implement these policies as the board of the Sertrans Uluslararası Nakliyat ve Tic. A.Ş. (The Company).

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