

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

CONTENTS

1. Purpose and Scope	3
2. Definitions	3
3. Duties and Responsibilities	4
4. General Principles	5
5. Application	5
6. Main Risk Takers for Bribery and Corruption Acts	6
7. Outstanding Principles in the Fight Against Corruption and Bribery	8
8. Privacy	9
9. Education and Communication	9
10. Reporting Policy Violations	9
11. Policy Violations	10
12. Publication and Storage of Policy	10
13. Update Frequency	11
14. Entry into Force	11
15. Related Documents	11

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Purpose and Scope

Batıçim Batı Anadolu Çimento Sanayii A.Ş. and the Anti-Bribery and Anti-Corruption Policy of its subsidiaries over which it has direct and indirect control ("**Batı Anadolu Group Companies**") ("**Policy**") main purpose; To ensure that Batı Anadolu Group Companies are fully compliant with ethical values and legal regulations, to protect business ethics standards, to create a framework to prevent bribery and corruption, and to ensure that employees are informed on the said issue. Policy; It aims to maintain healthy and fair business relations with employees, business and solution partners, to create a transparent business culture and to protect and strengthen the reputation of Batı Anadolu Group Companies. At the same time, this Policy aims to determine the rules, principles and responsibilities to be carried out to detect and prevent actions that can be considered within the scope of bribery and corruption.

covers the employees, managers, business and solution partners of Batı Anadolu Group Companies working at all levels, including the members of the Board of Directors in each company (referred to as the "**Board of Directors**" for each company separately). Additionally, it provides a general framework that is valid in all regions where Batı Anadolu Group Companies operate. The policy covers all units, departments and business processes within Batı Anadolu Group Companies. At the same time, the scope of the Policy is constantly reviewed and updated at least once a year in order to ensure the compliance of Batı Anadolu Group Companies with ethical, legal and business updates.

Batı Anadolu Group Companies; expects its suppliers, contractors and business and solution partners to comply with the Policy and pay attention to the examined elements. For this purpose, Batı Anadolu Group Companies; It adds a regulation stating that this Policy will be complied with in the contracts it will make with suppliers, contractors and business partners .

2. Definitions

Bribery ; Providing any illegal benefit for doing or not doing a job in a way that is incompatible with the requirements of the job, unethical behavior aimed at influencing the relevant official by offering direct or indirect payment or any other benefit in order to influence decisions and practices related to the job. expresses. Bribes may take the form, but are not limited to, financial gains, gifts, entertainment, donations or other advantages.

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Corruption; By abusing the positions held within the Batı Anadolu Group Companies and the powers due to the duties carried out; It includes unethical and unfair actions carried out with the aim of influencing decisions, gaining financial advantage or gaining private gain. This includes, in particular, misuse of the assets of Batı Anadolu Group Companies, interference in internal operations, requesting, offering, promising, giving or accepting bribes or any other illegal benefit, and obtaining any material or moral gain measurable in cash, gifts or money. , may include issues such as fraud and fraudulent financial practices.

3. Duties and Responsibilities

All Batı Anadolu Group Companies' managers and employees, especially the members of the Board of Directors and the Batı Anadolu Group Executive Board (" **Executive Board** ") members (Board members and Executive Board members together will be referred to as " **Senior Management** "), are **expected to comply** with the Policy . In addition, the basic duties and responsibilities of the managers and employees of Batı Anadolu Group Companies under the Policy are as follows.

ROLE	DUTIES AND RESPONSIBILITIES
Senior management	<ul style="list-style-type: none"> ● the Policy into force by approving it and to approve the updated Policy when necessary , ● the Policy is reviewed regularly and in any case at least once a year and updated when necessary, ● To ensure that the basic implementation principles under the policy are fulfilled, ● of the Policy and promote its effective implementation, ● To distribute the Policy within the Batı Anadolu Group Companies,

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

	<ul style="list-style-type: none"> • To support ethical values and disseminate them in the culture of Batı Anadolu Group Companies, • To coordinate and supervise the implementation of the Policy in the units and departments of Batı Anadolu Group Companies, • with the Policy and the rules and regulations under the legal legislation regarding bribery and corruption under the Policy, and • To ensure compliance with the principles of justice, impartiality and openness in business processes and decisions. <p>It is one of the primary duties of the Senior Management. In this context; Senior Management adopts the "Fairness, Impartiality and Openness" Principle.</p>
Employees	<ul style="list-style-type: none"> • currently reviewed Policy, • To complete the training assigned to understand and internalize the Policy, • To report incidents that are thought to violate the Policy to the Batı Anadolu Group Ethics Committee in the manner prescribed within the scope of the Policy, and • Adopting transparency and ethical standards in relations with business partners, contractors and suppliers every employee. In this context;

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

	<p>Employees adopt the principle of "Transparency in Relationships".</p>
<p>Bati Anadolu Group Ethics Committee ("Ethics Committee")</p>	<ul style="list-style-type: none"> ● To ensure that applications are examined/investigated in a timely, fair and sensitive manner, by taking measures to ensure the privacy and security of people reporting policy violations, ● ex officio investigation in cases deemed suspicious, ● To complete the relevant review and reporting studies if the necessary directive is given by the Senior Management and ● In case of detection of a violation, take the necessary measures to correct it and ensure compliance with the Policy. <p>It is the main responsibility of the Ethics Committee.</p>

4. General Principles

- Bati Anadolu Group Companies; It is committed to establishing a transparent, fair and ethical relationship with its employees, suppliers, contractors, business and solution partners.
- Bribery, corruption and all kinds of illegal activities are strictly prohibited.
- In all business processes and relationships, it is essential to act in accordance with the principles of honesty, openness and accountability.

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

5. APPLICATION

of the Policy is based on the principles determined within the Batı Anadolu Group Companies. The application is shaped around these basic principles:

Training and Awareness: Employees are regularly provided with training on anti-bribery and corruption and awareness-raising programs are organized.

Internal Audit and Risk Assessment: Internal audit processes are regularly implemented within Batı Anadolu Group Companies and potential risk areas are identified and preventive measures are taken.

Reporting and Review Mechanisms: Reliable reporting mechanisms are created for employees and business and solution partners to report suspicious situations. Suspicious situations go through a transparent internal investigation process.

Legal Cooperation and Sanctions: In case of policy violation, legal processes are followed and sanctions are applied. Legal responsibilities are observed.

Monitoring and Updating the Policy: The policy is reviewed periodically and updated when necessary. Compliance with changing legal regulations, internal and external environmental conditions is ensured.

The basic implementation principles within the scope of the policy are fulfilled by the Senior Management or by managers and employees authorized by the Senior Management.

6. Main Risk Areas for Bribery and Corruption Acts

Batı Anadolu Group Companies identify the main risk areas where acts of bribery and corruption may occur as follows;

- receiving gifts
- Facilitating payments,
- Relations with suppliers, contractors and business partners,
- Representation and hosting,
- Sponsorship,
- political activities,
- Accuracy of records.

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

i. Receiving a Gift

Batı Anadolu Group employees and managers cannot offer or accept gifts in their relationships with public employees, customers, suppliers, contractors and other business and solution partners in situations that may lead to or be perceived as a conflict of interest.

Batı Anadolu Group employees and managers cannot offer or accept gifts in situations that may lead to or be perceived as a conflict of interest, and in any case, they cannot accept gifts whose financial value exceeds 50.00 (fifty) USD. When faced with such a situation, the relevant manager or employee should politely reject the gift and state that they cannot accept the gift due to "Policy".

The total value of gifts accepted from various sources within a calendar year must not exceed 250 (two hundred and fifty) USD. Batı Anadolu Group Companies employees are required to fill out the "Gift Acceptance Declaration Form" and submit it to the Human Resources Directorate for each gift they accept with a value not exceeding 50.00 (fifty) USD. These Gift Acceptance Declaration Forms will be kept in the personnel file of the relevant person.

ii. Facilitating Payments

Facilitating payments can basically be defined as payments made to public institutions and organizations or their employees and officials in order to secure or accelerate routine transactions (obtaining permits, licenses, tender procedures, etc.).

Batı Anadolu Group Companies allow its employees and suppliers, contractors, business and solution partners to offer facilitating payments in order to secure or accelerate a routine transaction or process, regardless of the amount, or to accept such payments regarding the services of Batı Anadolu Group Companies. It does not allow them to do so.

iii. Relations with Suppliers, Contractors and Business Partners

Batı Anadolu Group Companies; It carries out its business processes with suppliers, contractors, business and solution partners and other third parties according to transparent and objective criteria. It is essential that suppliers, contractors and business partners acting on behalf of Batı Anadolu Group Companies act in accordance with this Policy and ensure that their employees comply with this Policy

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

are obliged to monitor and audit whether this third party complies with this Policy before carrying out a process with any third party . In this regard, appropriate mechanisms must be established by the managers and employees authorized by the Senior Management in this regard to carry out the audit in question, and when necessary, these mechanisms must be updated in accordance with the changing application conditions.

Within the framework of the audit carried out during the establishment of business relations with suppliers, contractors and business partners with which Batı Anadolu Group Companies have business relations; will not work with third parties that do not have a structure that complies with this Policy .

Policy by third parties during the processes they carry out with third parties, and to ensure that, even if this situation cannot be prevented, the Batı Anadolu Group Companies are not harmed by this situation and suffer as little damage as possible, It is essential to ensure that contractual, operational and other mechanisms are established.

iv. Representation and Hospitality

Batı Anadolu Group Companies carry out representation and hosting activities when necessary to develop their commercial relations. The representations and entertainment in question are basically; social events, accommodation, dinner invitations, training, symposiums, conferences and seminars, etc. can be exemplified as activities.

Within the scope of establishing a commercial communication network and developing commercial relations; Hospitality may be offered to other companies and/or real persons who have commercial relations with Batı Anadolu Group Companies. Batı Anadolu Group Companies offer their hospitality to third parties openly and unconditionally, in good faith. Even if they comply with the matters specified in this Policy , hospitality offers that may lead to a conflict of interest or situations that may be perceived as such cannot be made, gifts cannot be offered or accepted.

v. Sponsorship

All corporate support and sponsorship requests regarding the activities of Batı Anadolu Group Companies are forwarded to the Corporate Communications unit of Batı Anadolu Group Companies. These submitted requests are evaluated objectively by the Corporate Communications unit and

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

presented to the Executive Board. Sponsorship support is provided after the approval of the Executive Board.

vi. Political Activities

Engaging in political activities is a constitutional right as well as an internationally recognized human right. Batı Anadolu Group Companies respect the right of its employees to individual and voluntary participation in legal political activities arising from the constitution. However, employees should perform these activities outside working hours and avoid using company resources for political activities.

Batı Anadolu Group Companies are not party to any political views or ideology. The resources of Batı Anadolu Group Companies cannot be used to support political parties and candidates, and promotional and donation activities cannot be carried out in support of a political movement. Propaganda activities of political parties and candidates are not allowed at Batı Anadolu Group Companies locations.

Employees of Batı Anadolu Group Companies must observe the following conditions in the political activities they engage in individually and voluntarily:

- Employees must avoid situations that may create a conflict of interest in their current duties and responsibilities due to the political activities in which they are involved.
- The company name, title within the company and resources belonging to Batı Anadolu Group Companies cannot be used in political activities carried out individually.
- Political propaganda cannot be made during working hours and the workplace environment, employees cannot be asked to become members of a political party in any way, and other employees' time cannot be taken for these activities.

vii. Accuracy of Records

Batı Anadolu Group Companies carry out all kinds of accounting transactions in accordance with legal regulations and keep the accounts, invoices and documents in this regard by recording them completely, precisely, transparently and accurately in accordance with current legal regulations. Does not falsify in any way the accounting or other commercial records related to any transaction and the documents related to these records.

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Accordingly, Batı Anadolu Group Companies;

- Establishes internal control systems that will prevent any unregistered transactions, and
- The controls carried out in accordance with the said internal control system are carried out within the scope of duly authorizations,
- The financial statements prepared within the company or outsourced to third parties are prepared in accordance with generally accepted accounting principles,
- Facts are not distorted in reporting internally or by third parties,

provides reasonable assurance that

7. Outstanding Principles in the Fight Against Corruption and Bribery

i. Zero Tolerance Commitment

Batı Anadolu Group Companies have zero tolerance for acts of bribery and corruption. Any act of bribery and/or corruption will not be tolerated in the transactions of Batı Anadolu Group Companies employees and/or third parties with Batı Anadolu Group Companies.

ii. Commitment to Not Tolerate Bribery

While performing their duties, the employees and managers of Batı Anadolu Group Companies do not make any payments that can be considered as a bribe to a third party, or allow the other party to offer, promise, request, demand, give or accept this in their relations with third parties. does not tolerate it.

All our employees are obliged to act in accordance with the rules regarding bribery and the "Business Ethics Rules and Working Principles" published by Batı Anadolu Group Companies.

8. Security

It is essential that the information sharing between Batı Anadolu Group Companies within the scope of the processes they carry out with third parties is carried out within the framework of the principle of confidentiality.

In this regard, the employees of Batı Anadolu Group Companies in all positions are required to keep all information they have confidential, as well as the suppliers, contractors, business and solution partners and other third parties with whom they have relationships, in all processes carried out within

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

the Batı Anadolu Group Companies; is obliged to ensure that necessary contractual, operational and other precautions are taken to keep any information shared with them confidential.

Information sharing with legally authorized real and legal persons and relevant Public Institutions and Organizations in order to fulfill a legal obligation is excluded from the mentioned issue.

Suppliers, contractors, business and solution partners and employees in all positions of Batı Anadolu Group Companies are obliged to keep the information they have due to their positions and activities in an appropriate and safe storage environment. At the same time, the mentioned groups of persons are obliged to confidentially convey the information they have due to their positions in all activities they carry out within the Batı Anadolu Group Companies, only if the work carried out makes it essential and by taking appropriate technical and administrative measures.

9. Education and Communication

This Policy has been announced to the employees of Batı Anadolu Group Companies and is available for permanent access electronically through Softexpert . Additionally, it is open to all stakeholders via the website.

Training is an important tool for increasing employee awareness. In this context, training programs are designed by the Human Resources unit, in which the participation of all employees of Batı Anadolu Group Companies is mandatory. These trainings can sometimes be carried out physically or sometimes electronically.

All new employees of Batı Anadolu Group Companies must complete training on anti-bribery and anti-corruption within the first week of their employment. It is also possible to provide additional training for those working in high-risk tasks.

10. Reporting Policy Violations

If there is an opinion or suspicion that an employee or any person acting on behalf of Batı Anadolu Group Companies has acted contrary to this Policy, this matter will be reported to the Ethics Committee by the managers and employees who detect this issue at etik@batianadolu.com e-mail. It must be sent via postal address or via petition as stated in the Business Ethics Rules and Working Principles.

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Bati Anadolu Group Companies encourage an honest and transparent approach; It supports any employee or third party who expresses their concerns in good faith and keeps the notifications made to the Ethics Committee confidential in this context. No employee can be subjected to pressure or punishment due to a notification made to the Ethics Committee within the scope of any transaction that he/she thinks violates this Policy , and no change can be made in the scope or place of duty for this reason without obtaining the written approval of the Ethics Committee.

If the person making the report is subjected to such treatment, he/she must report it to the Ethics Committee.

11. Policy Violations

In cases that are or are likely to be contrary to the Policy , the matter is examined by the Ethics Committee ex officio or upon notification, and in case of detection of inappropriate behavior, the necessary sanctions are determined and applied.

is established and acts within the framework of the " Business Ethics Rules and Working Principles " annexed to this Policy .

the Policy in contracts made with companies, suppliers, contractors, business and solution partners from which goods and services are purchased and sold, or persons and organizations working on behalf of Bati Anadolu Group Companies, the works / contracts in force will be terminated by Bati Anadolu Group. Provisions are included stating that companies can terminate unilaterally for just cause, and in case of Policy violation, these provisions apply without exception.

This policy is supported by the Senior Management of Bati Anadolu Group Companies and expects every employee to adhere to these principles. Success in the fight against bribery and corruption depends on each employee adopting, implementing and constantly reviewing this policy.

12. Publication and Storage of the Policy

This Policy is stored electronically.

BATI ANADOLU GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

13. Update Frequency

this Policy with changing legal regulations and internal and external environmental conditions is ensured.

The policy is reviewed or ensured to be reviewed by the Senior Management at least once a year and updated if necessary.

14. Entry into Force

This Policy comes into force with the approval of the Executive Board.

15. Related documents

1. Business Ethics Rules and Working Principles
2. Gift Acceptance Declaration Form

GÜLANT CANDAŞ

Deputy Chairman of the Board of Directors

Executive Director