

Zorlu Enerji Anti-Bribery & Corruption Policy

At Zorlu Enerji, we are committed to operating with integrity, transparency, and adherence to ethical values in all geographies where we conduct business.

This policy has been developed in full alignment with Zorlu Holding's Code of Ethics, and is guided by the principles of transparency, respect for human rights, legal compliance, and responsible business conduct.

This Anti-Bribery and Anti-Corruption Policy outlines Zorlu Enerji Group's approach and practices in preventing bribery and corruption across all operations.

1. Prevention of Bribery and Corruption

Definition of Bribery and Corruption: For Zorlu Enerji, **Bribery** is defined as any direct or indirect provision of financial or non-financial benefits to a person or an organization, or to a third party designated by them, with the intent to induce an act in violation of the requirements of their duties. **Corruption** is the abuse of entrusted power or authority, whether directly or indirectly, for the purpose of obtaining personal, private, or unfair material gain.

Definition and Prohibition of Facilitation Payments: **Facilitation Payments** refer to small-scale, unofficial payments made to public officials or private sector employees to expedite or secure the performance of a routine, non-discretionary action (such as customs clearance, visa processing, or obtaining permits). Zorlu Enerji **strictly prohibits** the offering, promising, or making of such payments, regardless of the amount or the designation under which they are made.

Zorlu Enerji strictly prohibits offering, giving, receiving, or soliciting any form of bribe—either directly or indirectly—to or from any individual or organization, including public officials. All forms of corruption, embezzlement, abuse of authority, and unethical behavior are categorically unacceptable.

2. Guidelines for Gifts and Hospitality

Any gift, hospitality, or other advantage that may create or appear to create improper influence in business relationships is strictly prohibited. Such acts are only acceptable if:

- The value is symbolic and modest,
- The gesture is made openly and not in secret,
- The practice complies with the laws of both parties' countries,
- It does not aim to influence business decisions.

Examples:

- A traditional gift set worth approximately 200 TL offered by a visiting foreign business partner for New Year's may be accepted with the approval of the Human Resources and Ethics Compliance unit.
- Concert tickets offered by a supplier during an ongoing procurement process must be declined as they violate ethical standards.

3. Guidelines for Political Contributions

Zorlu Enerji does not make direct or indirect political contributions to any political party, candidate, or campaign. Company resources may not be used for political purposes.

Examples:

- Providing financial support to a political rally using corporate funds is strictly prohibited.
- Personal political donations made voluntarily by employees with their own resources fall under individual responsibility and are separate from the company.

4. Guidelines for Charitable Contributions or Sponsorship

Zorlu Enerji supports charitable donations and sponsorships that generate social value. These contributions must:

- Not intended to gain improper advantage,
- Be conducted in a transparent manner,
- Follow internal approval procedures.

Examples:

- In-kind donations made to the Turkish Education Foundation (TEV) to support earthquake victims are legitimate contributions.
- Sponsorship of a local NGO's educational project is acceptable if the content aligns with company values and is approved through proper channels.

5. Training and Awareness

All Zorlu Enerji employees receive anti-bribery and anti-corruption training during onboarding and at regular intervals thereafter. Training programs comply with legal regulations and internal policies.

6. Reporting Violations and Process Management

In the event of a suspected violation of this policy, employees are encouraged to report it through the Ethics Hotline, which ensures confidentiality. All reports are carefully reviewed and investigated objectively, and internal investigations are launched if necessary.

7. Corrective and Disciplinary Actions

Any breach of this policy may result in disciplinary actions in line with company procedures, including warnings, dismissal, or termination of employment. Where legally required, the relevant authorities will also be notified.

8. Policy Endorsement and Accountability

This policy is approved by the Board of Directors of Zorlu Enerji and its implementation is the responsibility of the Executive Management. The effectiveness of the policy is reviewed regularly and updated as necessary.

Public Disclosure

This policy and related information are publicly available at Zorlu Enerji website.



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