
Eti Soda Inc.
Anti-Bribery and Anti-Corruption Policy

Purpose of the Policy

Our main objective of Anti-Bribery and Anti-Corruption Policy is not to accept or not to give the products and services, which means as bribery or exceeds the intention within the scope of Our Responsibilities Against Society and Humanity, to respect laws and harmonize legislations, never bribing and not to give any facilitation payment to third parties on purpose, not to pursue any relationship with third parties, i.e. firms and business partners that we procured external service) who demand and/or offer any bribery/corruption.

Bribery: Cash or non-cash interests provided illegally to a person or third parties who have access/influence to the person in order to influence the decisions and practices related to the person's duty, to do a job, not to do it, to accelerate, to slow down and to perform similar actions in a way that is contrary to the requirements of the duty,

Corruption: Abuse of a person's realm of authority to gain unfair advantage for him/herself or for another person,

Presents: The product that does not require any financial payment and is generally given by people or customers with whom we have business relations as a thank you or commercial courtesy

Representation and Hospitality: Activities of Eti Soda Inc. within the scope of social events, accommodation, dinner invitation, training, conference, symposium and seminars and similar activities,

This policy shows Eti Soda Inc.'s Anti-bribery and Anti-Corruption Undertaking and anti-corruption and its approach to anti-bribery and anti-corruption.

Policy Statement

- This policy involves, shareholder, all workers at every level who work at Eti Soda Inc., suppliers/subcontractors companies providing services, companies providing consultancy and auditing services, and not limiting with these companies but also all other stakeholders with whom Eti Soda Inc. has commercial and social relations.

Responsibilities

- Including ensuring compliance with legal and ethical obligations, The Board of Directors of the Company is generally responsible for this policy,
- Management is responsible for ensuring that those who report them to understand this policy and comply with it.
- The Quality Assurance & Quality Control Department is primarily responsible for the active implementation of the policy, including monitoring the effectiveness of the policy and ensuring that all staff know, understand and comply with the policy.
- The Quality Assurance & Quality Control Department will welcome any questions, comments or suggestions about this policy.
- Quality Assurance & Quality Control Department is responsible for annual reporting to the Anti-Bribery and Anti-Corruption Compliance Coordinator regarding the ISO 37001 management system.

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Implementation of the Policy

- By any adjective; including employees at all levels, subcontractors / suppliers providing services, companies providing consultancy and auditing services, and not limiting with these companies but also all other stakeholders with whom Eti Soda Inc. has commercial and social relations must read, understand and apply this policy.
- It is the responsibility of all employees to prevent, detect and report bribery and corruption in any part of the company's operations and supply chain. Employees working on behalf of the company are required to avoid any activity that may result in violation or breach of this policy.
- Our employees must take the necessary actions within the scope of the following basic issues in order to comply with the policy and to continue the business in accordance with the policy.

Gifts and Entertainment: Gifts or hospitality will never be accepted from any supplier unless they are of truly symbolic value. It will be ensured that all the gifts and entertainment proposed are in accordance with the values of Eti Soda.

Representing the Company: In business relations, professional behaviors will be followed in accordance with the values of Eti Soda. Speaking and writing on behalf of Eti Soda will be avoided unless legally authorized.

Bribery and Facilitation Payments: This type of payment will never be deliberately made or demanded to third parties. Regardless of its purpose; receiving, giving, offering or money laundering is unacceptable.

Donation payments (Contribution to the Society): Only donation payments will be made in line with our public interest and / or corporate values and our working strategies.

Conflicts of Interest: No money will be accepted from third party persons or companies that have a business relationship with Eti Soda. Regardless of its purpose, it is unacceptable to provide benefits and interests.

Just Fair Competition: Our employees are responsible for complying with the competition laws in all markets and not violating the intellectual and property rights of third parties.

Fight Against Money Laundering: Our employees should avoid being associated with the criminal activities of others (even if innocently) in order to protect the reputation of Eti Soda and not to take criminal responsibility.

- In cases where there is a conflict with this Policy or it is believed or suspected to be in the future, the Ethics Committee should be informed as soon as possible.
- In case of any risk, violation or concern regarding bribery and corruption issues, an e-mail should be sent to etik@etisoda.com. Our company also has a Notification Policy and Procedure
- If you believe or suspect that this policy has been or may be violated, you should report it as soon as possible in accordance with our Notification Policy. You should remind that when appropriate, to assist our suppliers in addressing anti-bribery and anti-corruption practices in their business and supply chains will be supported and guided by Eti Soda.

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- At every stage of our activities; We aim to promote transparency, reliability and compliance with the law. Under this policy, we declare that we will support anyone who raises genuine concerns in good faith. We are committed to ensuring that no one will be exposed to harmful treatment in case of any form of bribery and corruption (gifts, donations, conflict of interest, fraudulent registration and money laundering, facilitation payments, breach of tax obligations, etc. that are not in compliance with business ethics codes) in any part of our business or in our supply chains.

Training

- Eti Soda; ensures that all its employees receive the necessary training to comply with these policies and procedures, recognize and avoid crimes within the scope of anti-bribery and anti-corruption.
- Our company expects companies in the supply chain to provide training to their employees within this scope as well.

Case of Breach

- In case any Eti Soda employee is involved in bribery and corruption crimes and violates this policy, necessary disciplinary procedures will be applied with zero tolerance principle.
- When it is determined that a crime for bribery and corruption has been committed in company operations; The responsible person is determined and disciplinary procedures are applied.
- Corrective action is applied as soon as possible in order to end the relevant situation, the effectiveness of the measures taken is monitored.
- In the event that a crime for bribery and corruption is detected in a company in the supply chain;

The company is expected to act transparently and to provide the information requested by our company,

Corrective action is expected to be implemented as soon as possible to end the relevant situation, and it is expected to monitor the effectiveness of the measures taken,

Depending on the content of the contract signed with the firm, the relationship may be terminated, suspended or the volume of business reduced.

Revision

This policy will be reviewed once a year by the Board of Directors simultaneously with the Anti-Bribery and Anti-Corruption Statement by Eti Soda Inc.

Genel Müdür

07/01/2021