



ANTI-CORRUPTION POLICY

I. Objective

With the Anti-Corruption Policy, it is aimed to reveal the anti-corruption policies and practices of Ataer Mining Company. This policy is an integral part of Ataer Mining's Code of Ethics and Working Principles, which form the basis of all our business relationships and transactions.

II. Scope

Anti-Corruption Policy covers Ataer Mining Company and all third parties acting on behalf of this company, members of the Board of Directors and employees. It is essential that all individuals and organizations within this scope act in compliance with the policy.

III. Anti-Corruption Policy

Members of Ataer Mining's Board of Directors, employees and all third parties acting on behalf of group companies must stay away from any behavior and action that may place Ataer Mining Company under suspicion within the scope of corruption. Regardless of the public or private sector, it is forbidden to receive or give any cash/non-cash benefits that may fall under the scope of corruption.

A. Legal Environment

The Organization for Economic Cooperation and Development (OECD), of which Turkey is a member, signed the "Convention on the Prevention of Bribery to Foreign Public Authorities in International Commercial Transactions" in 1999 and emphasized the importance of preventing all kinds of bribery that may occur during commercial transactions. All countries that are members of the Organization for Economic Cooperation and Development have defined bribery to be offered/to be given to public authorities, regardless of whether they are domestic or foreign, as a crime. Similar agreements emphasizing the sensitivity on this issue have also been implemented in other international platforms such as the United Nations and the Council of Europe. The Republic of Turkey has also accepted to be a party to these agreements and implements the regulations brought by these agreements.

B. Definitions

i. What is Corruption?

Corruption refers to the abuse of the authority, which is acquired due to the position, for the purpose of obtaining material or moral gain, directly or indirectly.

A corruption crime can result not only in the punishment of the perpetrators, but also in legal or criminal sanctions for their managers and the companies, they represent if they violated their supervisory duties at the time of the crime. Bribery is among the most common examples of corruption.

Bribery is obtaining an illegal advantage in order to do or not to do a job contrary to the requirements of the task, and to obtain a direct or indirect payment or benefit in order to influence decisions and practices. This can happen in many different ways, such as making a cash or non-cash payment, making a donation, giving a gift beyond symbolic value, making an offer that will provide personal benefit. Bribery is defined as a crime in accordance with the Turkish Penal Code, and the sanctions to be applied in case of employees in public joint stock companies committing acts subject to bribery are defined in the Turkish Penal Code.

Conflict of interest; as stated in Ataer Mining Code of Ethics and Working Principles, it is a situation that shows the potential of obtaining personal or corporate benefits by using the status of a person or institution inappropriately. In order to talk about a conflict of interest, an inappropriate behavior need not have occurred. Therefore, not every conflict of interest situation should also be considered as corruption. However, individuals and institutions may become vulnerable to corruption cases by being subject to any conflict of interest. The parties to this policy document are obliged to take measures to eliminate the conflict of interest, if any, against the potential risk of corruption.

ii. What is the Facilitation Payments?

Facilitation payments is the provision of some cash or non-cash benefits to the public authorities that follow up the relevant transactions in order to speed up the rightful works and transactions of the persons (legal permit and license, visa application, etc.) to be carried out in the state institutions or to secure the result. The participation of persons and organizations covered by this policy in such payments cannot be accepted under any circumstances. Ataer Mining employees cannot be held responsible for any disruptions or delays that may occur in business processes as a result of not making the facilitation payments.

iii. Who is the public authority?

A public authority is a person who participates in the conduct of public activity in any way, permanently or temporarily, either by appointment or by election. Political party members, candidates, and people working in non-governmental organizations are also considered within the scope of this definition.

C. Procurement and Sales Process

Purchasing Processes: At Ataer Mining Company, purchasing processes are carried out within the scope of transparent business processes and by observing objective criteria.

In the purchase of goods and services, it is essential to work with suppliers who provide benefit by directly taking responsibility for supply, who do the invoicing themselves, and who have financial and legal responsibilities.

In line with the decision of the Board of Directors, it is possible to work with intermediary institutions or individuals only in cases stipulated by the supplier company and with the approval of the purchasing committee.

In such obligatory and exceptional cases, it is essential that the negotiations with the intermediary company or the individual be carried out by contacting the main supplier company. During the procurement, a second party from the group company should be included in all negotiations with suppliers by purchasing unit employees. All other application details in the purchasing process are described in the Purchasing Procedure.

D. Third Parties Acting on Behalf of Ataer Mining

Compliance of all third parties (suppliers, customers, business partners, subcontractors, intermediaries, etc.) acting on behalf of Ataer Mining with legal regulations, Ataer Mining Code of Ethics and Working Principles and Anti-Corruption Policy is carefully observed. In this respect, third parties acting on behalf of Ataer

Mining cannot in any way receive or give any benefit in order to improperly influence a commercial decision.

The commitments of the parties doing business with Ataer Mining to comply with the relevant legal regulations, the ethical rules of Ataer Mining and the anti-corruption policies are included in the employment contracts and full compliance with the provisions of the contract is observed. In case of non-compliance with the policy principles and legal regulations, these issues are discussed and examined in the Ethics Committee and the implementation and sanction dimension of the policy takes effect according to the decision taken.

E. Mergers and Acquisition

Prior to acquisitions and mergers by Ataer Mining, the corruption risk, internal control environment and reputation record of the company to be acquired or to establish a partnership are thoroughly examined.

If necessary, these examinations are carried out under the consultancy of an expert company. The results of the examination are evaluated in the relevant decision bodies.

A mutual agreement is reached by displaying a common approach with the company for which the merger decision has been taken, in order to carry out all activities and transactions in the country and abroad in accordance with the rules of international law and the Anti-Corruption Policy to which the Republic of Turkey is a party.

F. Recruitment Process

During the recruitment of key positions, extensive resume and reference scans are performed with the knowledge and approval of the person beyond the current human resources procedures.

G. Donations and Sponsorships

Ataer Mining does not support any illegal activities, projects that will encourage any discrimination in the society, organizations with political/religious/ethnic content, and activities that encourage harmful habits.

All kinds of in-kind and cash donation requests, corporate social responsibility suggestions and requests for Ataer Mining Company are forwarded to the Human Resources Executive. Human Resources unit related assistance requests; He submits his views on compliance with OYAK's principles and strategies and on the traceability of the donation to the Chairman of the Board of Directors for approval.

All corporate support and sponsorship requests to Ataer Mining are forwarded to the Human Resources function. Requests that are evaluated objectively and then decided as positive by the unit are submitted to the approval of the Chairman of the Board of Directors. In accordance with company principles, it has been adopted as a principle not to enter into a sponsorship relationship with any institution other than institutions such as sectoral associations/unions/committees that support product sales and contribute to improving relations with customers.

All donations and sponsorships made by Ataer Mining are kept as recorded.

H. Accuracy of Records

Ataer Mining is responsible for recording and keeping all kinds of accounts, invoices and documents in a complete, precise, transparent and accurate manner in accordance with current legal regulations. No tampering can be made on the accounting or other commercial records of any transaction and the documents related to these records. The accuracy of the records is secured through Ataer Mining's internal control process, risk assessments, control activities, reporting and surveillance practices. Ataer Mining's financial statements are regularly audited by internationally recognized independent audit firms.

I. Trainings

Face-to-face trainings and e-learning practices aimed at increasing the awareness and competence of company employees on ethical rules and anti-corruption issues are developed and regularly implemented with the support of Human Resources units. In the design and implementation of the training programs, the risk levels in the processes are taken into account, and function-specific training programs are created according to the needs.

J. Risk Assessments, Internal Controls and Audit

There are effective internal controls in Ataer Mining's business processes to prevent potential corruption risks. In this context;

- Compliance with corporate policies, procedures, instructions and standards is ensured,
- Full compliance with the Authorization Limits Regulation, which defines the transaction authorization in the purchasing, sales, marketing, financial affairs, human resources and corporate relations processes within the company, is observed,
- In the SAP ERP system, where accounting and purchasing applications are carried out, user authorizations are managed through the GRC system and compliance with the principle of segregation of duties is observed,
- Corruption risk are also evaluated within the scope of corporate risk management practices and these risks are continuously monitored. Works within this scope are periodically reported to the Early Detection of Risks Committee, which consists of independent board members,
- It is ensured that the corporate business targets are determined realistically and reduced to individual targets in order to avoid an environment of corruption,
- The effectiveness of risk management, internal control and governance processes in group companies is evaluated within the scope of audits carried out by the internal audit function. In these audits, potential corruption risks in the relevant processes are also addressed At least one a year, and when requested, the audit Committee, which is composed of independent board members, is informed about the internal control environment, examination and investigation activities regarding corruption risks. Corruption risks are also discussed.

K. Resolution of Violations

Ataer Mining has communication channels (e-mail, mail and ethics hotline) where all stakeholders can report or receive information regarding a possible non-compliance within the scope of developing and maintaining the anti-corruption and ethical

compliance system. Access to these communication channels is limited to the Human Resources Executive, who reports directly to the Chairman of the Board of Directors. Observed or suspected potential violations against Ataer Mining employees and all third parties acting on behalf of Ataer Mining must be communicated immediately through ethical communication channels, either anonymously or anonymously. The identities of the persons making the notification are kept confidential and the matters communicated are examined within the scope of confidentiality rules.

You can use the following communication channels for all your questions and notifications.

E-mail : etik@ataermadencilik.com.tr

Mail : *“To the Attention of the Ethics Committee ” - Istanbul address on our company's website*

L. Resolution of Conflicts

The Ethics Committee is the body responsible for resolving non-compliance with the Anti-Corruption Policy at Ataer Mining and imposing sanctions when deemed necessary. The Committee consists of the Chairman of the Board of Directors and the Managing Director, the Group Human Resources Chief Executive and the Group Legal Chief Executive; the Internal Audit Chief Executive carries out the reporter - processes. The Ethics Committee implements the processes within the scope of the ethical compliance system in order to implement the Anti-Corruption Policy.

M. Enforcement and Review

This policy has been published with the approval of the Board of Directors and is reviewed once a year in line with the needs and current practices.