

Our company has implemented the Anti-Bribery and Anti-Corruption Policy as an indication of its sensitivity to business ethics.

Within the scope of this principle, our company acts with a "zero tolerance" approach against bribery and corruption and undertakes to continue its activities in a fair, honest, legal, and ethical manner.

ATEA's anti-bribery and anti-corruption policy includes all employees, including the Board of Directors, persons and organizations (business partners) acting on behalf of our company, including suppliers, consultants, lawyers, and external auditors.

Implementation and updating of the Anti-Bribery and Anti-Corruption Policy is under the authority, duty and responsibility of the Board of Directors.

In addition, all employees of ATEA;

- Comply with the policies determined by the Board of Directors,
- Effectively manage the risks related to their work area,
- Work in compliance with the relevant legal regulations and the practices of ATEA,
- In case of encountering a behavior, activity, or practice contrary to the Policy, they are responsible for informing the top management.

Principles For the Policy

1. Bribery and Corruption

Corruption is the abuse of power, directly or indirectly, for any kind of gain.

Bribery is the provision, offer or promise of a benefit, directly or through intermediaries, with the aim of making, doing, not doing, speeding up or slowing down a job related to the performance of one's duty. It is to provide a benefit to himself or to the party requesting it, or to someone else due to this relationship, within the framework of an agreement reached with another person in order to act contrary to the requirements of his duty.

While ATEA is against all forms of bribery and corruption, it is determined to comply with the relevant laws, regulations, and principles. It is absolutely unacceptable to take or give a bribe, regardless of its purpose. It is essential not to continue the business relationship with third parties who want to receive service from ATEA and request service through bribery.

Bribery and corruption can occur in different ways:

1.1. Gift

A gift is a product that does not require a monetary payment and is generally given as a thank you or commercial courtesy by people or customers in business relations. The gift should always be proportionate and reasonable. The gift must be for a legitimate purpose and not create any conflict of interest or perception.

Gifts should only be offered and received in connection with a traditional business or cultural event. No gifts should be given to government officials on behalf of the ATEA.

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Quality Assurance Manager	General Manager

1.2. Facilitation Payments

ATEA does not allow individuals and organizations covered by the policy to offer their employees facilitation payments to secure or speed up their routine work or process.

1.3. Donations

It is essential that no corporate or personal payments, gifts, aids or donations be made to any private company, government official or political party candidate to affect any decision during the service procurement and efficiency stage related to the continuation of the company's activities or for the benefit of the company.

Employees of ATEA must ensure that their donations are made to bona fide/real charities and are not used to hide bribery. All charitable donations and social responsibility expenditures on behalf of ATEA require the written approval of the Board of Directors.

1.4. Firms and Business Partners

Firms and business partners from which outsourcing services, including support services, are required to comply with the Policy principles and other relevant regulations. Work with individuals and organizations that violate the Anti-Bribery and Anti-Corruption Policy is terminated.

In the selection of outsourced companies and business partners, it is also considered that they have a positive background apart from the usual technical criteria and have policies 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.

1.5. Representation and Hospitality

ATEA may carry out representation and entertainment activities to develop commercial relations and to establish a commercial communication network. (Accommodation, dinner invitation, etc.) The hospitality offered is openly and unconditionally offered in good faith. It is important to ensure that representation and hospitality do not occur prior to the process of making a fundamental and important decision. Hospitality offers are not offered or accepted in such cases, in order not to cause situations that may cause or be perceived as a conflict of interest.

2. Keeping Records

All kinds of accounts, invoices and documents relating to relations with third parties (customers, suppliers, other service providers, etc.) are recorded and preserved in a complete, transparent, precise, fair and accurate manner. Internal control systems have been established to prevent unregistered transactions.

It is important not to make any changes to the accounting or similar commercial records of any transaction and not to deviate from the facts.

3. Education and Communication

Our Anti-Bribery and Anti-Corruption Policy has been announced to ATEA employees and is constantly and easily accessible via the corporate website. Trainings are organized to raise awareness of our employees about bribery and anti-corruption.

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4. Notice of Violations

ATEA employees or persons acting on behalf of ATEA can immediately notify the Human Resources department of any person or institution that violates these policy rules or any situation that violates these rules. In addition, such violations can be made via the complaint box.

During the investigation and investigation to be made after the notification, maximum attention is paid to the confidentiality rules, and the personnel who make the notification are primarily not harmed.

5. Policy Breaches

In case of violation of the Anti-Bribery and Anti-Corruption Policy, disciplinary punishments that may lead to termination of employment, depending on the nature of the event, come to the fore. In cases that are contrary to this policy, the issue is examined by the Disciplinary Board and necessary sanctions are applied in line with the legislation in case of detection of non-compliant behavior.

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