

NUROLHOL-C-2023-0152-ENG
Anti-Bribery and Anti-Corruption Policy

NUROL HOLDING
ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

At Nurolog Holding, we adopt a “zero-tolerance” policy against bribery and corruption throughout all our operations. With this understanding, we prohibit the acceptance or offering of bribes in any situation, misuse of authority for personal gain, or engagement in any corrupt activities. We ensure that all Nurolog Holding employees and managers act with the awareness of combating bribery and corruption by implementing the procedures and controls within their respective roles. As a signatory of the United Nations Global Compact, we adopt all its principles, including the principle of "opposing all forms of corruption" and consistently uphold ethical behaviors and practices.

In accordance with our anti-bribery and anti-corruption approach, we are committed to adopting the following principles:

- To effectively monitor violations related to bribery and corruption, apply appropriate disciplinary measures upon detection, take necessary legal actions in accordance with applicable laws, and report to the relevant authorities,
- To ensure that all employees strictly adhere to the principles of honesty and integrity and refrain from any actions that could compromise the company's reputation due to bribery and corruption,
- In situations contrary to the policy, to apply the sanctions specified in the contracts with employees, suppliers, and business partners, and if deemed necessary, terminate business relations,
- To abstain from any payments that might be construed as bribes or kickbacks, and to avoid directly or indirectly providing or accepting business advantages,
- To refrain from accepting gifts, meals, or entertainment that could be considered bribes from customers, suppliers, or subcontractors, and to avoid giving gifts to any public official for any purpose,
- To refrain from making donations or providing in-kind/cash aid to any political party,
- To provide a secure environment for employees and stakeholders to report suspicions of bribery or corruption through the establishment of anonymous reporting mechanisms, and to conduct investigations transparently when needed,
- To ensure employee awareness and adherence to the Anti-Bribery and Anti-Corruption Policy through regular training programs,
- To evaluate the policy's effectiveness through internal and external audits and update it as required,

- To enforce disciplinary actions, including dismissal, against employees found in violation of this Policy, and to engage Nurool Holding's Legal Advisory Office in necessary legal procedures if identified actions are deemed contrary to legislation.

This Policy is subject to periodic reviews and updated as required, with the Nurool Holding Corporate Communications and Sustainability Department being responsible for its updates. It was approved by the Board of Directors of Nurool Holding Inc. on 25.04.2024 with decision number 2024/6 and came into effect on the same date.