



## **NUROL HOLDING INC.**

### **COMPLIANCE PROGRAM AND COMPLIANCE POLICY**

Since its establishment, Nurol Holding Inc. has been keen to stick to local and international laws in various sectors and geographies and, therefore conducting an efficient corporate Compliance Program.

Through our policies on international economic sanctions, export control obligations, anti-bribery, anti-corruption, and anti-money laundering, the rules that Nurol Holding Inc. and its Group Companies must comply with have been determined, and by the Compliance Program, compliance with these rules is monitored at the Group level.

Failure to comply with those restrictions and rules in our compliance policy may result in critical risks for our companies, employees and directors, not only in legal and monetary terms, but also in terms of business reputation. Therefore, all directors, employees and business partners of Nurol Holding Inc. and its Group Companies are obliged to act in accordance with these policies.

The Compliance Program is implemented under the supervision and guidance of Nurol Holding Inc. International Law and Compliance Department. The Compliance Committee and the Compliance and Risk Board established within Nurol Holding conduct risk assessments to determine whether a business transaction violates or is likely to violate the restrictions and rules spelled out in the policies.

With the Compliance Program, Nurol Holding Inc. aims to guide all Group Companies, directors, employees and business partners in line with the global developments and to ensure that they act in compliance with local and international rules.