

ANTI-BRIBERY AND CORRUPTION POLICY

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The Anti-Bribery and Corruption Policy, an annex to the Sustainability Policy, aims to ensure that all business processes within Ateş Wind Power are conducted in full compliance with laws and ethical values; it adopts a zero-tolerance principle against bribery and corruption, making transparency, integrity, and accountability an integral part of the corporate culture.

The Anti-Bribery and Corruption Policy applies to all employees, managers, subcontractors, suppliers, business partners, representatives, and all factories within Ateş Wind Power.

Ateş Wind Power accepts, commits to, and declares the following principles under this policy:

- Strictly refuse to provide any direct or indirect material or non-material benefits to public officials or private sector employees.
- As employees and third parties, do not offer or accept gifts, payments, donations, or commissions to gain business advantages.
- Conduct gift and hospitality practices in accordance with company procedures; ensure they are reasonable, transparent, and symbolic in value, and never allow them to influence decision-making processes.
- Ensure full compliance with laws and ethical principles in all interactions with public officials.
- Act transparently in processes such as participation in government tenders, obtaining licenses, and permits.
- Support business partners and suppliers in complying with anti-bribery and anti-corruption principles; act within a framework of clear communication and responsibility.
- Base supplier selection on transparent criteria; do not continue cooperation with individuals or institutions engaging in unethical behavior.
- Do not provide any direct or indirect financial support to political parties, candidates, or public officials.
- Conduct all sponsorship and donation activities legally, with proper documentation, and subject to authorized approval.
- Avoid funds from unclear, illegal, or unregistered financial transactions and implement periodic internal and external control/audit mechanisms to prevent such corruption activities.
- Conduct all financial transactions legally, traceably, and in a documentable manner.
- Provide regular training to employees on anti-bribery and anti-corruption matters.
- Ensure that situations involving potential conflicts of interest are reported transparently and necessary measures are taken.
- Adopt a zero-tolerance approach to cartel formation, price-fixing, market sharing, or other unfair competition practices; ensure full compliance with fair competition and free market rules.

The Anti-Bribery and Corruption Policy is implemented throughout the company's activities. Transparency, adherence to ethical principles, and a culture of accountability are reinforced across all levels, from daily operations to strategic planning. Necessary financial and technical resources are provided. Secure and anonymous reporting channels have been established for suspected bribery or corruption, ensuring confidentiality and protection from retaliation, including disciplinary action, dismissal, or obstruction of promotion. Reports are assessed impartially by the Ethics Committee; investigations and checks are conducted, and appropriate actions are taken in line with the company's disciplinary processes.

The primary responsibility for the effective implementation of the Anti-Bribery and Corruption Policy lies with the Ethics Committee, which ensures the policy is applied and reports results to the Board of Directors. Additionally, all employees and business partners are responsible for fulfilling legal obligations regarding anti-bribery and corruption. Senior Management regularly monitors and evaluates the application of the Anti-Bribery and Corruption Policy.

This policy is reviewed at least once a year by Senior Management and updated in line with legislative changes, audit results, and international ethical practices.