

ACISELSAN ACIPAYAM SELÜLOZ SANAYİ VE TİCARET A.Ş.

ANTI-BRIBERY and ANTI-CORRUPTION POLICY

PURPOSE

The purpose of Anti-Bribery and Anti-Corruption Policy ("Policy") is to ensure the compliance of Aciselsan Acipayam Selüloz Sanayi ve Ticaret A.Ş. ("ACISELSAN", "Company") with anti-bribery and anti-corruption legal regulations, ethical and professional principles and universal rules.

1. SCOPE

Anti-Bribery and Anti-Corruption Policy covers all Company employees, intermediaries, proxies, suppliers, contractors, third parties, affiliates including the Company's Board of Directors and those doing business together.

This Policy is an integral part of the legislation, other legal regulations and the Company's other internal regulations, including the Human Resources Regulation and the Donation Regulation that the Company is subject to.

2. DEFINITIONS

A. "Bribery" means that a person acts contrary to the requirements of his / her duty and gains a certain benefit by doing, not doing, accelerating, slowing down within the framework of an agreement with a third party.

B. "Corruption" means the solicitation, offering, giving or accepting a bribery or any other illegal benefit that leads directly or indirectly to bribery and to the deviation from lawful performance of the duties or required conduct of the person who obtains an unlawful benefit.

C. The definition of "internal regulations" refers to the policy, regulation, procedure, instruction, circular letter, directive, application principle / instruction and announcements, reminders and notifications announced to the organization by e-mail.

D. "Audit Committee" refers to the committee in which decisions are made regarding disciplinary issues regarding all employees, except for Senior Management and employees who are subordinate to the Board of Directors pursuant to legal legislation or internal legislation.

3. AUTHORIZATIONS AND RESPONSIBILITIES

The Board of Directors of the Company is responsible for the establishment, implementation and updating of the Anti-Bribery and Anti-Corruption Policy. Disciplinary penalties are imposed for company employees violating these principles. The authority to examine such cases belongs to the Audit Committee assigned in accordance with the internal regulations of the Company.

The company employee is primarily responsible for communicating suspicious or hesitant situations, including bribery and corruption, directly to the Audit Committee, together with their senior managers. Bribery and corruption notices delivered verbally / in writing by the customer and / or external third parties are directed to Verusa Holding Ethics Line (Etikhat@verusa.com.tr / 02122907490) directly to Verusa Holding Audit Committee.

The investigation, examination etc. is handled and executed by the Audit Committee according to the content and nature of the reported situation, and by the Internal Control Department in case of operational error, risk and similar notification. The reported situation is examined on the basis of confidentiality of the notifying employee / third party and the content of the notification. If deemed necessary at the end of the investigation, feedback is provided to the notifying employee / third party.

4. MAJOR RISK AREAS FOR BRIBERY AND CORRUPTION ACTIONS

The company always states its aims in full compliance with the relevant laws, regulations and principles and does not tolerate any act of bribery and corruption regardless of its purpose. The business relationship with third parties who want to get service from the Company and request service through bribery is terminated. The main risk areas where bribery and corruption can occur are described in detail below.

a. Gifts and Entertainment

A gift is a product that does not require any monetary payment and is generally given by people or customers with business relationships as a thank you or business courtesy.

All kinds of gifts given to third parties by the Company are offered clearly and unconditionally in good faith. Although the same principles apply to the acceptance of the gift, gifts with a value that may cause an obligation are not accepted, except for the symbolic gifts given in accordance with these principles.

Within the scope of establishing commercial communication network and developing commercial relations; Hospitality may be offered to customers, consultants, lawyers, auditors and other companies that have commercial relations with the Company. The company offers hospitality to third parties in good faith, explicitly and unconditionally.

Even if they comply with the matters specified in this Policy, hospitality offers and gifts that may cause conflict of interest or cause situations that may be perceived in this way are not offered or accepted.

b. Political donation

Political donations cannot be made on behalf of the company. The principles regarding donations and aids are regulated in the Donation Regulation of the Company.

c. Outsourced Firms and Business Partners

The Company determines the companies from which it will outsource services, including support services, within the scope of the internal regulations of the Company. It conducts due diligence while evaluating its business partners, and does not work with related persons and organizations in case of receiving negative information about bribery or corruption. It is essential that outsourced companies and business partners comply with this Policy and other relevant regulations. The Company informs the said companies and their partners that they have to comply with the said Policy rules. Business relations with persons and organizations that do not comply with the said principles and other relevant regulations are terminated.

d. Facilitation Payments

The Company does not allow individuals and organizations covered by the Policy to offer facilitation payments to secure or expedite a routine transaction or process with government agencies.

5. POLICY VIOLATIONS AND SANCTIONS

All Company employees are obliged to comply with this Policy, relevant legal regulations and all applicable anti-corruption laws. In the event that the company employees act against the rules in this Policy and the Company's internal legislation, disciplinary penalties up to the termination of the employment contract depending on the nature of the incident may be applied. In addition, there may be criminal liability for those who do not comply with the relevant legal regulations and applicable anti-corruption laws. It is not acceptable for any employee to be subjected to ill-treatment because of refusing to participate in a bribery or corruption incident, reporting violations of the principles contained in this Policy, or expressing concerns about possible future corruption actions.

6. TRAINING

This Policy is open to all employees on our website.

7. REVIEW

This Policy is regularly reviewed and necessary updates are made and shared on the Company's website.