

Anti-Bribery & Corruption Policy

Principles of Integrity, Transparency, and Legal Compliance

1. PURPOSE AND CORE DIRECTIVES

This Anti-Bribery and Corruption Policy ("Policy") defines the operational framework and governance principles established by Atius Innovation and Advanced Technology Solutions Ltd. ("Atius") and its affiliates ("Atius Group") to mitigate, identify, and manage corruption risks across all business domains. The core objective is to preserve corporate reputation, ensure absolute regulatory compliance, and foster an organizational culture grounded in accountability and transparency.

2. SCOPE AND APPLICABILITY

This regulation binds all personnel of Atius Group, including Board Members, executive directors, permanent staff, and contingent workers. Furthermore, external service providers, contractors, legal advisers, independent auditors, and any commercial partners acting for or on behalf of the Group must strictly adhere to these provisions.

This Policy complements the Atius Code of Conduct, internal operational guidelines, the UN Global Compact, and statutory laws in all jurisdictions where the Group operates. Business partners are explicitly informed that non-compliance may lead to legal accountability for Atius, making contractual adherence mandatory.

3. KEY DEFINITIONS

Bribery: The act of offering, promising, giving, soliciting, or receiving any financial benefit, facilitation fee, or personal advantage—directly or through intermediaries—to influence official decisions, expedite administrative tasks, or secure improper commercial gains.

Corruption: The abuse of entrusted corporate or public power for private enrichment. Acts of corruption, whether involving public officials or private sector counterparts, are strictly prohibited regardless of monetary value or whether the commitment has been fulfilled.

4. GOVERNANCE AND ROLES

Board of Directors: Maintains ultimate authority over the approval, enforcement, and periodic revision of this Policy. Guarantees confidential reporting systems and oversees corrective interventions.

Ethics Committee & Audit Committee: Responsible for reviewing, investigating, and resolving reported violations. Internal Audit conducts formal investigations. Allegations involving senior C-level executives fall directly under Audit Committee jurisdiction.

Staff & Management Obligations: Employees must understand their specific risk areas and report irregularities immediately. Managers must ensure third parties under their supervision comply with these principles.

5. OPERATIONAL STANDARDS & RISK DOMAINS

Atius Group operates under a strict zero-tolerance standard against corruption. Key operational guidelines include:

- **Government Interactions:** Providing valuable items, cash equivalents, or facilitation payments to public officials, political entities, or state bodies to influence official duties is prohibited globally.
- **Gifts & Corporate Hospitality:** Promotional gifts and business entertainment must remain within reasonable, lawful boundaries. Benefits that create perceived or actual conflicts of interest are strictly rejected.
- **Political Contributions:** Atius Group prohibits making political donations or leveraging company resources to support political organizations or candidates.
- **Third-Party Engagement:** Partner onboarding involves rigorous background checks. Entities with prior corruption records are disqualified, and mandatory termination clauses are included in all contracts.

6. BOOKS, RECORDS, AND TRANSPARENCY

All financial books, ledgers, and accounts must accurately reflect transactions with complete transparency. Off-the-books transactions, falsified entries, or misleading records constitute severe grounds for termination. Corporate communication tools, including company emails, are subject to compliance reviews under applicable regulations.

7. REPORTING CHANNELS & WHISTLEBLOWER PROTECTION

Employees and external stakeholders who witness or suspect Policy violations must report them immediately via dedicated channels. Good-faith reporting is protected against retaliation, disciplinary measures, or career detriment.

Ethics Email Hotline
etikbildirim@atius.com.tr

Compliance Desk
corporate-governance-compliance@atius.com.tr

Direct Hotline Phone
+90 312 286 21 22

Digital Case System
Atius Workflow / Notification Desk

Mailing Address: Ethics Committee, Oguzlar Mah. 1371. Cad. No: 4/7 Cankaya / Ankara, Turkey

8. ENFORCEMENT AND DISCIPLINARY ACTIONS

Breaches of this Policy by internal staff will trigger disciplinary procedures up to employment termination, alongside legal reporting where criminal liabilities arise. Third-party non-compliance will result in immediate contractual termination and potential civil litigation.

This Policy enters into force upon Board approval and serves as an integral annex to employment agreements.