

DRAAKON GROUP A.Ş.
ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

As Draakon Group, in all regions where we operate and are represented, we strictly do not accept the receipt or giving of bribes for any purpose whatsoever, nor corruption and the abuse of authority by officials for the purpose of obtaining any kind of benefit, directly or indirectly.

All Draakon Group employees and managers are obliged to first comply with all requirements within the scope of combating bribery and corruption while carrying out procedures and controls within their duties and responsibilities, and then to share, implement, and ensure the implementation of these requirements with external stakeholders.

With this Anti-Bribery and Anti-Corruption Policy, Draakon Group adopts the principles outlined below as a general framework.

- Draakon Group employees may submit notifications regarding unethical situations they have witnessed or suspected, especially bribery and corruption, through the system in a manner where their personal information and notifications can only be seen by the Ethics Officer. Employees who wish to make anonymous notifications without sharing personal information may also submit their notifications by selecting “Draakon Group Ethics Line” via the contact form under the communication section of the Draakon Group corporate website, again in a manner accessible only to the Ethics Officer. External stakeholders may also submit notifications anonymously, without any obligation to disclose their identity, in the manner described on the corporate website.
- Since the main risk areas where bribery and corruption may occur have been identified as gifts and hospitality, sponsorships and donations, conflicts of interest, and facilitation payments, actions in these areas must comply with the Draakon Group Code of Conduct and Ethics:

- **Gifts and Hospitality:**

Any gifts given to or received from third parties by Draakon Group must be offered or accepted in good faith and without any expectation of benefit. Such gifts must be symbolic in nature, not of high value, infrequent, and within the monetary limits specified in the Draakon Group Code of Conduct and Ethics. The Code of Conduct and Ethics shall also apply to any hospitality activities offered by or to third parties.

- **Sponsorships and Donations:**

Draakon Group shall provide sponsorships or make donations only in cases determined to be lawful and ethical. Draakon Group shall not make any payments or help with the purpose of supporting any political formation or individual.

- **Conflicts of Interest:**

Employees at all levels of Draakon Group shall avoid activities focused on personal interests that may cause a conflict of interest with the company, such as establishing business relationships with relatives or friends, abusing their position, or undertaking duties in external businesses.

- **Facilitation Payments:**

Draakon Group strictly does not tolerate facilitation payments offered to secure or expedite a routine transaction or process. Likewise, employees and business partners are not permitted to make facilitation payments on behalf of Draakon Group.

- This policy has been announced through all existing communication channels of Draakon Group and is easily accessible via the company's internal intranet and corporate website. Training programs are organized to increase stakeholders' understanding of the policy.

All activities carried out within Draakon Group are recorded in accounting records in accordance with applicable legislation and relevant principles and standards. All such records and documents are clearly presented during audits conducted by independent audit firms.

Purpose of the Policy

The purpose of this policy is to establish the principles and rules to be applied in combating bribery and corruption for all relevant stakeholders, primarily our employees.

Scope of the Policy

This policy covers all Draakon Group employees, including the Board of Directors, as well as all suppliers, contractors, consultants, lawyers, auditors, and all other individuals and entities acting on behalf of Draakon Group.

Implementation of the Policy and Applicable Legislation

This policy has been established by concretizing and regulating the rules set forth under applicable legislation and similar regulations within the scope of Draakon Group practices. In the event of any inconsistency between the applicable legislation and this policy, the provisions of the applicable legislation shall prevail.

Entry into Force of the Policy

This policy is reviewed periodically and updated when deemed necessary. The Corporate Governance and Sustainability Directorate is responsible for updating the policy.

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CEO