

	<h1>PROCEDURE</h1>	Document Code
		DTY-INS-PRO03
Subject	FIGHT AGAINST BRIBERY AND CORRUPTION	

1. Purpose The purpose of this Procedure is to establish the principles, methods, and responsibilities regarding the implementation of anti-bribery and anti-corruption practices in our company, in compliance with legal regulations and ethical values.

2. Scope This Procedure applies to all employees of our company.

3. Responsibility All personnel, including Human Resources, are responsible for carrying out the activities.

4. Definitions

- **Bribery:** Offering, giving, receiving, or persistently demanding something of value to influence an outcome.
- **Corruption:** Offering, promising, giving, receiving, accepting, requesting, or soliciting money, gifts, or any benefits, either measurable or immeasurable, to obtain or maintain an advantage in business activities.
- **Gift:** Any item or benefit, whether or not it has economic value, accepted directly or indirectly, that may or may not influence an employee's impartiality, performance, decision-making, or duties.

Anti-Bribery and Anti-Corruption Program: Activities carried out to define the principles of anti-bribery and anti-corruption, identify risk areas, reduce or eliminate risks, establish the framework of principles and practices, ensure its continuity, and facilitate communication, all in compliance with legal regulations and ethical values.

5. Implementation Principles In accordance with our Anti-Bribery and Anti-Corruption Policy, we conduct all our activities in compliance with the rules specified in the 5237 Turkish Penal Code and the 5326 Misdemeanor Law, which form the basis of our business relationships.

5.1. Rules

- Our suppliers, subcontractors, consultants, customers, employees, and all business partners with whom we may work should not be listed on national or international Restricted Persons lists.
- We do not work with companies for which negative intelligence related to bribery or corruption has been received. The responsibility for conducting the necessary market research before starting work lies with the relevant process manager.
- Company employees cannot enter into an indirect private business relationship with the company's customer for their own benefit, in exchange for any service, money, or other consideration, which may lead to requesting any consideration in return for any work.

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They cannot borrow money or lend money to the customer.

- Direct offers, payments, and various benefits made to company employees by customers in the context of commercial bribery are considered a crime according to the law and are subject to punishment. In this regard, it is strictly forbidden for company employees to directly or indirectly accept personal payments or bribes.

- Assistance or donations from any individual or organization connected to the company are not acceptable.

Company employees cannot accept gifts, various privileges, or presents from customers or individuals and institutions from whom we purchase services. They cannot make any requests that would put the company and its field of responsibility at risk. However, gifts within the limits set by tradition and/or ceremony can be accepted. (Gifts can be accepted provided that they bear the giver company's special logo. For example, pens, diaries, etc.)

- Any gift that our company intends to give to third parties should be given openly, in good faith, and unconditionally. Even if it complies with our company's rules, situations that may lead to conflicts of interest or be perceived in this way should not be allowed to arise or, in such cases, gifts should not be offered or accepted.

- Representation and entertainment; social events; accommodation and meal invitations; our company may offer entertainment to third parties for the purpose of developing commercial relations and establishing a normal commercial communication network. Entertainment expenses are subject to approval within the limits determined by our company. Offers or acceptances of entertainment should not lead to conflicts of interest or be perceived in this way. In such cases, entertainment offers should not be made or accepted.

- Restrictions imposed on donations and assistance in accordance with relevant legal regulations will be followed, and they will be carried out with the approval of the Top Management. No material or spiritual support can be provided for political activities on behalf of the company or an individual.

5.2. Violation Reports All incidents and situations related to bribery and corruption shall be reported via email to info@detaytekstil.com or through a written petition. The identity of the reporting person will always remain confidential and this confidentiality is guaranteed by the Top Management.

5.3. Evaluation The evaluation of reports regarding bribery and corruption violations is the responsibility of the Top Management, with the secretarial support of the Administrative Affairs and Procurement Officer.

5.4. Corrective Actions In case of violations, corrective activities are carried out by determining all procedures applied, frequency of controls, and protective measures.

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Corrective action (CA) records are created, and the process is monitored with CA records to identify root causes and create actions to rectify non-conformities and prevent their recurrence.

5.5. Disciplinary Penalties Procedures are followed according to the Disciplinary Procedure for employees who violate the rules.

6. Relevant Documents

- Disciplinary Procedure
- Non-Conformity Reporting and Corrective Activity Form

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