



ŞİŞECAM GROUP GIFT AND HOSPITALITY POLICY

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ŞİŞECAM GROUP GIFT AND HOSPITALITY POLICY

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ŞİŞECAM GROUP GIFT AND HOSPITALITY POLICY

1. PURPOSE

This policy specifies the principles and guidelines regarding the gifts given or received as part of the business relations of Group employees, and the hospitality activities organized.

2. SCOPE

This policy covers Group employees, shareholders and/or companies under their management, the Group's own companies and stakeholders, public officials, suppliers, customers, employee relatives and all other third parties.

Gifts and hospitality activities stipulated in the Şişecam Group Recognition, Appraisal and Reward Procedure or those between Group employees are excluded from this policy.

3. DEFINITIONS

Subsidiary: The affiliated companies operating under the Group and controlled by Şişecam,

Interest: The state of having all kinds of benefits, while making a decision or fulfilling one's duty, whether measurable in monetary value or not, which are provided to one's self, one's relatives, one's friends, or the persons or entities with whom one is in contact,

Gift: Products that are generally given or accepted for the purpose of courtesy or gratitude, which do not require a material or immaterial return or benefit, among persons in business relations,

CEO: The CEO of Şişecam,

Chief Officer: The executive, who reports to the CEO, and/or is represented on the Executive Board of the parent company, and is responsible for overseeing a certain function/field of activity,

Company or Şişecam: Türkiye Şişe ve Cam Fabrikaları A.Ş.,

Group Employee: All monthly and hourly paid employees of the Group companies,

Group: Türkiye Şişe ve Cam Fabrikaları A.Ş. and all Subsidiaries,

Representation and Hospitality Expenditures: In order to sustain the commercial activities of Şişecam, expenditures made for the purposes of establishing and developing relationships with customers, business partners and other external stakeholders, supporting sales and profitability, ensuring, and maintaining a good reputation in the eyes of third parties.

4. RESPONSIBILITIES

The Corporate Governance and Compliance Office is responsible for the following:

- Keeping the policy up-to-date and submitting the necessary changes for approval,
- Ensuring that records of notices regarding gifts, exceeding the limit, are kept.



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5. CODE OF PRACTICE

5.1. Principles Regarding Accepting and Giving Gifts

- Group employees may not receive or give gifts in violation of the Şişecam Group Code of Conduct or the Şişecam Group Anti-Bribery and Anti-Corruption Policy, even in compliance with the law.
- Entering relations with suppliers, customers, and other third parties that may create an impression of making a material benefit, such as gifts and entertainment, are not allowed. Any gifts that may be perceived as inappropriate or may create the impression of the existence of an irregularity are not accepted or offered, except the materials obtained according to the customs and traditions or souvenirs/promotional materials.
- Group employees may not accept gifts or offer to receive gifts from the main shareholders and/or the companies under their management, as well as from Group companies.
- Once a year, in November, a notice is sent by the Corporate Governance and Compliance Office to inform suppliers, customers and all other third parties with whom it has a business relationship, about the Şişecam Group Gift and Hospitality Policy.

Gifts Received:

- Group employees may, among themselves, accept gifts on special days for celebration purposes, provided that they do not offer to receive such gifts; managers from their direct or indirect reports or employees from their managers, may accept gifts of not high value within reasonable terms.
- Promotional/souvenir gifts, such as agendas, pen, calendar, that may be given periodically and do not have high monetary value, may be accepted, provided that the employee does not request such gifts from third parties with whom they have a business relationship.
- It must be ensured that the accepted gifts do not create the impression that the party that gives the gift has not been given preferential treatment or any privilege, do not compel commercial activities, do not provide financial benefits, do not affect the independence, performance, or decision-making ability of Şişecam Group, or harm the image of the Group.
- Precious metals (gold, diamonds, etc.), cash or easily convertible products, and gifts such as discounts/gift certificates, holidays, and tickets cannot be accepted.
- In exceptional cases, where the employee's will to refuse to accept the gift is not accepted by the other party, and where a risk of harming the business relationship arises, gifts up to €50 in accordance with commercial practices can be accepted, provided that they are one-off (once a year) or not regular.
- After receiving any gift exceeding €50 in value, it shall be notified to the unit manager and the Corporate Governance and Compliance Office and recorded in the system together with the specification of the date received, type, estimated value, and the presenting party. The return of gifts exceeding the limit is assessed together with the relevant employee. Gifts that are decided to be returned are returned with a cover letter of gratitude and information about the gift policy.

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Gifts Given:

- Gifts can be given provided that they are in compliance with the laws and regulations and are not regarded as a form of bribery, inappropriate payment, or tipping.
- Gifts cannot be presented to public officials/politically influential persons in the countries where the Group operates, to obtain or maintain a job.
- Gifts up to €50 in value may be given to third parties, provided that they are one-off or not regular.
- In using the limits of the gifts to be given to third parties, care is taken not to compromise the balance of compliance with corporate image and savings principles and such limits must not be used within the Group in any way.
- Gifts up to €50 in value are within the budget of the Chief Officers in accordance with the limits of authority.
- In internal and external Group relations, the approval of the CEO must be obtained for all the gifts exceeding €50 in value, and regardless of the limit that are given to public officials, in compliance with the laws and regulations, and in a manner that is not regarded as a form of bribery, inappropriate payment, or tipping, with an indication of the reason for giving the gift. The relevant gift is recorded in accordance with the accounting rules.
- When giving gifts exceeding €50 in value, Şişecam products should be preferred.

5.2. Representation, Hospitality

- Representation and hospitality should be one-off or irregular, should not constitute a form of bribery, inappropriate payment, or tipping, or be regarded as preferential treatment. Accordingly, representation and hospitality may be accepted or provided in accordance with the permitted commercial purposes, such as creating goodwill and improving relationships with business partners, in line with the Şişecam Group Code of Conduct.
- Employee participation in events, that are not open to public participation, that may significantly impair the impartiality of employees or create such an impression, and that are organized by associations and non-governmental organizations of which they are corporate members, is subject to the approval of the CEO.
- Hospitality cannot be provided to public officials/politically influential persons in the countries where the Group operates, to obtain or maintain a job. The processes can be carried out provided that they are in compliance with the laws and regulations and are within limits of authority, and that the event of hospitality is not regarded as a form of bribery, inappropriate payment, or tipping. The approval of the CEO must be obtained before the hospitality is provided with an indication of the reason for providing such hospitality. The relevant event of hospitality is recorded in accordance with the accounting rules.
- In the event that Group employees provide entertainment or meals to suppliers, customers or any other third party for the purpose of representation and hospitality, the regulations in the Şişecam Group Limits of Authority will apply.



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- Hospitality that results in personal interest or benefit cannot be provided, including hospitality for family members, relatives and/or acquaintances.

5.3. Violations

Regarding the conduct found to be in violation of the rules of this policy, the necessary disciplinary action, which may be as severe as the termination of the employment contract, shall be imposed within the framework of the Şişecam Group Disciplinary Regulation, the relevant provisions of the Collective Bargaining Agreement and legal regulations.

6. RELATED DOCUMENTS

Şişecam Group Limits of Authority

Şişecam Group Recognition and Appraisal Applications Procedure

Şişecam Group Code of Conduct

Şişecam Group Anti-Bribery and Anti-Corruption Policy

Şişecam Group Disciplinary Regulation

7. DOCUMENT HISTORY

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