

ARTICLE 1. PURPOSE

1.1. Beta Enerji ve Teknoloji A.Ş. (hereinafter referred to as the "Company") conducts transparent and honest activities. The purpose of the **Anti-Bribery and Anti-Corruption Policy** is to ensure that the Company operates in accordance with ethical standards and conducts activities and practices based on the principles of transparency and integrity. In line with this policy, the Company aims to create an ethical working environment within the organization and increase employee awareness.

ARTICLE 2 – DEFINITIONS

2.1. Bribery: Bribery is when a person, in the context of an agreement made with a third party, acts contrary to the duties of their position by performing or failing to perform a task, speeding it up, slowing it down, or in any other way, in exchange for a particular benefit.

2.2. Corruption: Corruption refers to the act of requesting, offering, giving, or accepting bribery or any other form of illegal benefit that causes deviations in the lawful execution of duties or required behaviors by a person in a position of power, either directly or indirectly.

2.3. Gift: A gift refers to any item or benefit, either with or without economic value, that is accepted directly or indirectly, and that may affect or potentially affect an employee's impartiality, performance, decisions, or ability to perform their duties.

ARTICLE 3 – SCOPE

3.1. In this context, the Company:

- Will fight against bribery and corruption in its business processes,
- Will fully comply with local and international laws, regulations, and ethical standards in its operations,
- Will operate ethically and responsibly, adhering to the principle of transparency, ensuring that activities conducted with business partners and suppliers are based on transparency, honesty, and ethical standards,
- Will promote honesty and fairness within the corporate culture and raise awareness in the community,
- Will demonstrate zero tolerance for bribery, corruption, engaging in illegal activities, or accepting bribes,

- Will identify bribery and corruption risks, take effective preventive measures, monitor business processes and operations regularly, and implement enhanced controls in the areas identified as high risk based on evaluations,
- Will regularly organize training for employees on fighting bribery and corruption, communicate and raise awareness about business ethics, and emphasize Company policies,
- Will establish a confidential and secure mechanism for employees to report bribery offers or acceptances within the Company,
Will make statements, commitments, and announcements to the public regarding these actions.

ARTICLE 4 – PRINCIPLES AND GUIDELINES

4.1. Transparency: All business and financial transactions should be conducted in an open and auditable manner, with information, except in cases requiring confidentiality, being accessible to stakeholders.

4.2. Accountability: Every employee and manager is personally responsible for taking proactive actions in the fight against bribery and corruption.

4.3. Compliance: Full compliance with local and international laws, regulations, and sectoral standards is required.

4.4. Zero Tolerance: A zero-tolerance policy against bribery and corruption will be enforced. Any form of bribery or corruption is strictly prohibited.

4.5. Training and Awareness: Regular training and awareness programs on combating bribery and corruption will be provided to employees.

4.6. Risk Assessment: Düzenli risk değerlendirmeleri yapılacak ve potansiyel rüşvet ve yolsuzluk riskleri proaktif bir şekilde yönetilir.

4.7. Whistleblower Mechanism: A mechanism will be established to allow reports of bribery and corruption to be made securely, ensuring the protection of confidentiality.

4.8. Investigation and Sanctions: Allegations of bribery or corruption will be thoroughly and fairly investigated. If proven, legal and disciplinary actions will be taken against the responsible individuals.

4.9. Business Relationships: All parties involved in business relationships with the Company, including business partners, suppliers, and other third parties, are expected to act in accordance with the Company's anti-bribery and anti-corruption policy.

4.10. Continuous Improvement: Efforts to combat bribery and corruption will be regularly reviewed, improved, and the policy and procedures will be updated regularly.

ARTICLE 5 – DUTIES AND RESPONSIBILITIES

5.1. Management: Management is responsible for ensuring the creation, implementation, and updating of the Anti-Bribery and Anti-Corruption Policy, establishing communication channels for employees to report violations of the policy, and taking necessary measures to ensure the confidentiality and safety of those making reports.

5.2. Disciplinary and Ethics Honor Board: The Board is responsible for ensuring that the Company's activities are conducted in line with ethical principles. It is tasked with evaluating and making decisions on ethical violations for employees in managerial positions and above, and for providing final decisions on ethical matters for all other employees.

5.3. Employees: Employees are required to carry out business processes in compliance with the rules set forth in the **Turkish Penal Code No. 5237** and the **Misdemeanor Law No. 5326**, as well as the institution's values. They are also obliged to report any suspicious situations they encounter.

Email: etikhat@betaenerji.com

Address: Hacı Sabancı Organize Sanayi Bölgesi Çanakkale Cd. No:11 / B Sarıçam ADANA / Türkiye

ARTICLE 6 – ENFORCEMENT

6.1. This **Anti-Bribery and Anti-Corruption Policy** was enacted by the decision of the Board of Directors dated April 4, 2025, and shall remain in effect until a new announcement is made.

ARTICLE 7 – REVIEW

7.1. This Policy is reviewed annually by the Disciplinary and Ethics Honor Board, based on checks related to process or technical infrastructure changes. The revised and updated version of the Policy is approved by the Board of Directors.

ARTICLE 8 – RELATED POLICIES

Ethical Conduct Policy

Human Resources Policy

Sustainability Policy

Reason for Revision :	New Document
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Prepared By	Approved By
Management Systems and Sustainability Engineer	General Manager