

### 1. PURPOSE

This document has been prepared in order to support the implementation of our business processes in line with ethical principles, legal requirements, and our corporate values, without any other influence.

In order to facilitate the avoidance of conflicts of interest and ethical violations, the principles regarding the issue of receiving and giving gifts from/to third parties by Elif employees are determined in this document.

### 2. SCOPE

The activities of receiving and giving gifts carried out by Elif employees, the Board of Directors, suppliers, customers, independent auditors, vendors, manufacturers, service providers, consultants, non-governmental organizations, civil servants and intermediaries who are in contact during the tender processes, and job applicants are within the scope of the document.

### 3. LIABILITIES

All managers and employees, together with the Human Resources and Ethics Committee, are responsible for the implementation of this document. The Ethics Committee consists of the people specified in the Request Management Policy document.

### 4. RULES

- 4.1. Any relationship of interest with any institution or person with whom you have a business or service relationship must be avoided. Direct or indirect exchange of gifts with any institutions or persons is against Elif's basic principles in terms of *conflict of interest*.
- 4.2. In this respect, gifts, discount privileges, travel, free accommodation, gift and meal checks with a material value of more than 100 TRY or which can be converted into cash must not be accepted or offered. Such and similar gifts and privileges cannot be used as a means of greeting, or as a means of greeting or thanks.
- 4.3. The welcoming, hospitality, meal and accommodation provided in connection with on-site inspection or technical support services must be specified in the service contract. Treats and expenses that are not expressly stated to be undertaken in the contract must not be made, and in the same way, expenses that are not specified to be borne by the other party must not be requested unless requested in writing on behalf of the institution with their justifications.
- 4.4. Elif employees must avoid any social relations with the companies and employees mentioned in the scope of this document.

Prepared by	System Approval	Confirmation	Approval of the Entry into Force
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## GIFT POLICY

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Page No: 1 of 2

4.5. Employees who are relatives, close friends or acquaintances from their social circles working in one of the parties with which the institution has a cooperation or business relationship are expected not to communicate with these people on behalf of the company and to report such a situation. Notification can be made to the Ethics Committee or Human Resources management. In the event that the employee notifies such to a situation a superior directly, it is the responsibility of the supervisor to convey the matter to the Manager Responsible for Social Compliance.

### 5. APPLICATION

- 5.1. In case any attitudes or behaviours contrary to this document are detected, the Ethics Committee convenes for evaluation. If it is concluded that there is a behaviour or situation contrary to the Code of Conduct and Ethics as a result of the evaluation, the situation of the relevant employees is evaluated within the scope of the Disciplinary Policy.
- 5.2. This document is added to the service contract along with the Code of Conduct and Ethics and shared with all customers and service providers and their approval is sought. The documentation is followed by the Quality Assurance department.

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