

DEMAŞ KUYUMCULUK İHR.İTH.SAN VE TİC.A.Ş.

GIFT ACCEPTING AND GIVING POLICY

1. PURPOSE

With this policy text, DEMAŞ KUYUMCULUK İHR.İTH.SAN. And TİC. A.Ş. (hereinafter referred to as DEMAŞ A.Ş.), the commitment to unethical practices and its approach to this issue are clearly revealed and the company image is protected. It is aimed to provide the necessary information to all employees, our business partners and suppliers regarding our Gift Acceptance and Giving Policy, which is an integral part of our company's ethical rules, and to determine the responsibilities and rules in this regard. The company's board of directors, all employees, our business partners and suppliers are obliged to strictly comply with this policy.

2. SCOPE

It includes all company employees, including the board of directors, companies and employees from whom we purchase goods and services, suppliers, consultants, lawyers, and individuals and organizations (our suppliers) working on behalf of the company, including external auditors.

This policy; It is an integral part of the Business Ethics Rules and Human Resources Practices within the company approved by the company's board of directors.

GIFTS RECEIVED FROM SUPPLIERS, SERVICE PROVIDERS OR OTHER BUSINESS PARTNERS

They are important customers for our company, suppliers and service providers. All employees, especially those responsible for purchasing, may receive unethical and inappropriate offers from suppliers or other business partners.

In this section, the following items are applied to all employees, especially those involved in a purchasing process.

- Suppliers can only be selected on a competitive basis. Efforts by suppliers to influence the purchasing decisions of our company's employees with gifts, grants or donations should not be tolerated. These attempts may be in favor of an individual or a third party. In this case, suppliers should be advised not to affect company employees in this way and should be warned if they themselves violate this condition. Suppliers who seriously violate or continue to violate this rule must be reported to the purchasing department. If the violation is serious or repeated, the business relationship should be terminated.

- Company employees are prohibited from receiving gifts directly or indirectly, gaining unfair advantage or buying valuable items.

FOR THE SUBJECTS OF GIFT AND INVITATION, THE FOLLOWING STATEMENTS EXCLUSIVE EXCLUSIONS

- The total value of the gifts received separately for each calendar year and the person / institution giving the gift is 300 TL. is less than

- If it is caused by business accommodation and customary business practices,

- Does not violate laws or regulations,

- May be exceptional if there is no reasonable or potential influence on the decision of the supplier to enter into a contract upon receipt of the gift or accommodation.

GIFTS ACCEPTABLE ACCORDING TO THE SPECIAL CASE

- Promotional gifts (eg pens, calendars, notebooks, coffee mugs, shirts or other simple clothing items, etc.) and other gifts, usually of no monetary value.
- Not being invited to business dinners from time to time as long as the invitation is for business purposes and the value of the business meal is appropriate for the invitee's position in the company.

GIFTS ACCEPTABLE WITH PERMISSION

It is strictly forbidden to accept gifts, donations, aids and invitations if it affects the behavior of the accepting employee in a wrong way. Particular attention is paid to whether the invitations cover travel or accommodation costs, or the expenses of an accompanying spouse or travel companion. In principle, it is forbidden to accept a Supplier to cover these expenses except where it fulfills its social or cultural responsibilities. (For example, inviting a spouse or friend to an accompanying dinner.) The exception to this situation is only subject to the prior approval of the employee's supervisor.

- It is always prohibited to accept money or its equivalent for the personal use of the purchasing or selling employee or for the benefit of a third party in purchases or sales for the Company (eg gift cards or gift certificates for some stores). The employee must immediately report the initiative to their supervisor. If the closest supervisor fails to comply, he / she should report it to the next level supervisor or to the ethical notification e-mail address.
- Invitations to events, such as sporting events, concerts, cultural events, trade fairs or conferences, although not often, must have a direct business purpose. The cost of the invitee is suitable for the location of the invitee in the country. Acceptance of such an invitation is only subject to the approval of the employee's supervisor.
- Because of these rules, care should be taken to ensure that the gift, donation, aid or invitation is within the framework of ethical rules, if not, the person should politely refuse it and mention this policy. If the gift is sent in advance, it must be returned.

GIFTS GIVEN TO EMPLOYEES OF CUSTOMERS OR OTHER BUSINESS PARTNERS

DEMAŞ A.Ş. does not want the purchasing decisions of its customers or other business partners' employees to be affected by personal gifts. Therefore, invitations and other donations to employees of customers or other business partners should be limited.

- Thus, such donations will likely not affect the customer's purchasing decision. Donations other than promotional gifts and invitations to regular business dinners are permitted only if the customer or business partner is notified to the employee's supervisor or authorized body and has received approvals for gifts.
- In principle, the same rules for receiving gifts from suppliers and service providers stated in the Section "Gifts Received from Suppliers, Service Providers or Other Business Partners" are applied to gifts given to employees of customers or other business partners.
- These rules apply equally to persons or other third parties who have a close relationship with the employee of the customer or business partner.

GIFTS GIVEN TO OFFICIALS AND STATE OFFICIALS

Likewise, the rules stated in the section "Gifts Received from Suppliers, Service Providers or Other Business Partners" apply to official authorities, government officials and third parties associated with these persons.

- Company employees should avoid that a promotional gift to be given to a government official could influence the decisions of that person in the performance of their official duties. For this reason, all employees are prohibited from taking any action or taking precautions that may be used in this print. It is forbidden in principle to give, offer, promise or authorize money or equivalent gifts, aids or donations to any public authorities or government officials. Exceptions are subject to the prior approval of the company official and ethics representative. Invitations to regular business dinners for government officials require the prior approval of the employee's supervisor. Making payments or providing non-cash equivalents, invitations, gifts, donations or grants (also known as expedition payments) to secure or expedite the routine transactions of government officials or private sector employees is always prohibited.

RISK AND PRECAUTION

DEMAŞ A.Ş. Take other measures to reduce the risk of corrupt behavior in addition to appropriate recruitment practices and appropriate training to prevent risks from occurring.

- In order to reduce the risk of bribery and corruption, the duties of personnel who may be exposed to corruption should be changed regularly or rotated. Failure to make these changes may result in an employee being exposed to personal or third party benefits and gifts from business partners, or becoming too close to business partners, thus losing the critical distance required to look out for the company's interests.

- All employees who are at risk of being exposed to bribery due to their job descriptions should receive training based on the obligations specified in this policy.

- The employee should be informed about this policy and related issues by his supervisor in on-the-job training.

- This policy should be shared in electronic format.

- Internal or external training programs should be used for follow-up training, as well as regular in-house expert meetings and, if available, internet-based training. (buyer, seller, regular department meetings, etc.)

- Initial and follow-up training should be documented. Relevant employees should receive anti-corruption training at least once a year.