

1. PURPOSE

The Anti-Bribery and Anti-Corruption Policy of SUB IQ YAZILIM ÇÖZÜMLERİ TİCARET LİMİTED ŞİRKETİ (SUB IQ) aims to declare and implement our principles in the fight against bribery and corruption, as guided by our Ethics, Compliance and Disclosure Policy and Human Resources practices, and in alignment with the United Nations Global Compact (UNGC) principles.

2. SCOPE

All employees, suppliers, group companies, and business partners of SUB IQ YAZILIM ÇÖZÜMLERİ TİCARET LİMİTED ŞİRKETİ (SUB IQ) are obliged to fully comply with this Anti-Bribery and Anti-Corruption Policy.

This policy is considered an integral part of the following corporate policies:

- Ethics, Compliance and Disclosure Policy
- Information Security and Digitalization Policy
- Human Rights, Inclusion, Diversity, Equal Opportunity and Human Resources Policy
- Sustainability Policy
- Gift Giving-Receiving and Hospitality Policy

3. DEFINITIONS

3.1 Bribery

Bribery refers to offering or accepting money, gifts, services, or any items of value in an unlawful or unethical manner by one person or organization to another for the purpose of gaining unfair advantage or benefit. Any act of hosting or hospitality intended to gain an advantage is considered bribery.

3.2 Corruption

Corruption is defined as any act by an individual or organization that violates legislation, ethical standards, or principles of integrity by prioritizing personal gain or harming others. Acts such as bribery (giving or receiving), theft, fraud, data manipulation, deception, and other unlawful or unethical actions are considered corruption by our company.

4. OUR PRINCIPLES IN THE FIGHT AGAINST BRIBERY AND CORRUPTION

4.1 Compliance with Laws, Standards, and Regulations

Our company conducts all operations in full compliance with applicable national and international laws, standards, and regulations. It clearly defines bribery and corruption,

and outlines the boundaries of gift giving-receiving and hospitality practices in our Gift Giving-Receiving and Hospitality Policy.

4.2 Integrity and Transparency

It is of utmost importance to us that all business processes are conducted with honesty, openness, and transparency. We promote relationships built on trust and integrity and do not tolerate any form of bribery, corruption, or unethical practices. We provide our employees with a fair and trustworthy working environment.

4.3 Business Ethics and Professional Conduct

All employees, suppliers, and group companies must strictly adhere to ethical principles and professional conduct. No unethical activities should be carried out under the definitions of bribery or corruption.

4.4 Combating Bribery and Corruption in the Supply Chain

We prioritize a supply chain that is entirely free of bribery, corruption, and conflicts of interest. All suppliers in our supply chain must comply with our principles and rules regarding ethics, bribery, and corruption. If any violation is detected, our business relationship with the supplier will be terminated immediately, and we will proceed with alternative suppliers.

4.5 Training and Raising Awareness

Our company provides training to increase the knowledge and awareness of employees on the subject of anti-bribery and anti-corruption. This helps prevent incidents resulting from lack of awareness or unintentional misconduct.

5. REPORTING VIOLATIONS

All violations related to bribery, corruption, or ethical issues must be reported to our Ethics Committee. Employees are expected to report such violations to their direct supervisor, to the Ethics Committee, or to the Board of Directors when necessary. Ignoring or deliberately concealing a violation is also considered corruption by our company.

All suppliers, business partners, and third parties must report any relevant violations to our Ethics Committee through our ethics email address: ethics@subiq.com.tr.

Those who report violations must not be subjected to psychological or physical threats, violence, or pressure by the violators. The identity of the reporting party is protected under our confidentiality policy unless they consent to disclosure.

6. RESPONSIBILITIES

Compliance with our Anti-Bribery and Anti-Corruption Policy is the responsibility of our company, employees, business partners, and group companies. The monitoring of its implementation and updates to the policy fall under the primary responsibility of our Board of Directors.

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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Date: 01.01.2025

Chairman of the Board of Directors, SUB IQ: Yusuf Yiğit AKKUŞ

Signature:

