

ANTI-BRIBERY & CORRUPTION POLICY

A. DEFINITION

Bribery is the offering or accepting of any gift, loan, payment, reward, or advantage for personal gain as an encouragement to do something dishonest, illegal, or a breach of trust, in the conduct of the Company's business.

Bribery is a criminal offence. Cladmate Facade Systems Ltd. prohibits any form of bribery. We require compliance from everyone connected with our business with the highest ethical standards and all applicable anti-bribery laws, including the UK Bribery Act 2010 and relevant international anti-corruption conventions, such as the OECD Anti-Bribery Convention. Integrity and transparency are of utmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by Cladmate Facade Systems Ltd employees or by third parties acting for or on behalf of Cladmate Facade Systems Ltd.

B. PURPOSE

This policy conveys to all employees and interested parties of Cladmate Facade Systems Ltd. the Company's rules regarding our unequivocal stance towards eradicating bribery. It demonstrates our commitment to ensuring that Cladmate Facade Systems Ltd. conducts its business fairly, professionally, and legally.

C. OFFENCE

It is a criminal offence to:

- Offer a bribe
- Accept a bribe
- Bribe a foreign public official
- As a commercial organization, fail to prevent bribery

A court conviction for bribery can result in up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

D. DEFINITIONS OF BRIBERY AND CORRUPTION

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption that involves giving or receiving money, gifts, meals, entertainment, or anything else of value to induce someone to act dishonestly or illegally in the course of business.

E. SCOPE

This policy applies to all employees of Cladmate Facade Systems Ltd., regardless of seniority or location. It also extends to anyone working for or on our behalf, such as those engaged on a self-employed basis or through an agency.

We encourage the application of this policy when our business involves third parties, such as suppliers and contractors.



F. GIFTS AND HOSPITALITY

We recognize that giving and receiving gifts and hospitality, where nothing is expected in return, can help form positive relationships with third parties when proportionate and properly recorded. This does not constitute bribery and is not considered a breach of this policy. Gifts include money, goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context), services, or loans given or received to express friendship or appreciation.

Hospitality includes entertaining, meals, or event tickets (when used in a hosted business context) given or received to initiate or develop relationships. Hospitality becomes a gift if the host is not present.

No employee or anyone working on our behalf should give gifts or hospitality to any party related to our business without prior written approval from the General Manager. Similarly, no employee or anyone working on our behalf should accept gifts or hospitality without prior written approval from the General Manager.

All instances of giving or receiving gifts or hospitality must be recorded.

G. POLICY

It is prohibited to directly or indirectly offer, give, request, or accept any bribe (gift, loan, payment, reward, or advantage), whether cash or any other inducement, to or from any person or company to gain a commercial, contractual, or regulatory advantage for the Company or any personal advantage for an individual or anyone connected with them unethically.

It is also prohibited to influence a foreign public official in this manner. Making payments to third parties on behalf of foreign public officials is also prohibited.

If offered or solicited a bribe, you should not agree to it unless your immediate safety is at risk. Immediately contact the General Manager to report the incident, and you may be asked to provide a written account of the events.

Any employee or person working on our behalf who suspects bribery, even if not personally involved, must report it to the General Manager and may be asked to provide a written account of the events.

H. THIRD-PARTY DUE DILIGENCE

We conduct appropriate checks before engaging with suppliers or other third parties to reduce the risk of our business partners breaching our anti-bribery rules. This includes:

- Assessing the third party's reputation and anti-bribery policies.
- Including anti-bribery clauses in contracts with third parties.
- Monitoring third-party relationships for potential red flags.

I. FINANCIAL CONTROLS

The Company maintains robust financial controls to prevent and detect bribery, such as:

- Segregation of duties.
- Regular audits of financial transactions.
- Clear expense approval processes.
- Regular reviews of financial records for unusual activity.

J. TRAINING AND COMMUNICATION

Cladmate Facade Systems Ltd. provides regular training to all employees on this anti-bribery policy. The training covers:

- Recognizing bribery risks and red flags.
- Understanding the consequences of bribery.
- Reporting procedures for bribery concerns.
- The Company's whistleblowing policy and procedures.

K. WHISTLEBLOWING

Employees can report any concerns about bribery or any other unethical behaviour confidentially through the Company's whistleblowing procedures. These procedures are available in the employee handbook and on the Company's intranet. The Company strictly prohibits retaliation against any employee who raises a concern in good faith.

L. MONITORING AND REVIEW

This policy is subject to regular review and may be amended to reflect changes in legislation or best practice. The Company monitors the effectiveness of this policy and its related procedures to ensure they remain adequate and appropriate.

M. DISCIPLINARY ACTION

We take any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation. We uphold all laws relating to bribery and will take disciplinary action against any employee or other relevant person working on our behalf if we find that bribery has occurred or been attempted. This action may include dismissal for employees or termination of contracts for self-employed individuals, agency workers, or contractors.

N. CONTACT

If you have any questions or concerns about this policy, please contact the Director.



Cumhuri KANTARCI
Managing Director
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