

Anti-Bribery and Corruption Challenge Policy

1. Purpose

The purpose of the Anti-Bribery and Corruption Policy (“Policy”) is to set out the anti-bribery and anti-corruption policies of Datacore Information Systems Ind. and Trade Inc. (“Datacore”), as outlined in Datacore's Code of Business Ethics.

2. Scope

The anti-bribery and corruption policy applies to:

- All Datacore employees, including the Datacore Board of Directors,
- Companies and their employees from whom we receive goods and services, suppliers, consultants, lawyers, external auditors, and individuals and organizations acting on behalf of Datacore (business partners).

This Policy is an integral part of:

- The Corporate Governance Principles and Datacore Code of Business Ethics, approved and publicly announced by the Datacore Board of Directors,
- The principles we commit to by participating in the United Nations Global Compact,
- Human Resources Practices.

3. Definitions

Corruption is the abuse of power held due to one’s position for the purpose of gaining any kind of benefit, directly or indirectly.

Bribery is an agreement where a person, directly or through intermediaries, agrees to provide, offer, or promise a benefit, or to receive, request, or accept such benefit, to perform, make, not make, expedite, or delay an action related to the performance of their duties, in violation of their duties. It can also include ensuring benefit to another person due to this relationship.

Bribery and corruption can be realized in many different forms, including:

- Cash payments,
- Political or other donations,
- Commissions,
- Social rights,
- Gifts, hospitality,
- Other benefits.

4. Duties and Responsibilities

The implementation and updating of the Anti-Bribery and Corruption Policy are under the authority, duty, and responsibility of the Board of Directors. In this context:

- The Corporate Governance Committee advises the Board of Directors to establish an ethical, reliable, lawful, and controlled working environment,

- Senior management assesses the risks according to the principles determined by the Board of Directors and establishes the necessary control mechanisms,
- The Ethics Committee monitors whether Datacore's activities are conducted safely and in compliance with legal regulations within their area of responsibility,
- Mechanisms for reporting, investigation, and sanctions are determined and operated if policies, rules, and regulations are not complied with.

Additionally, all Datacore employees are responsible for:

- Complying with the policies determined by the Board of Directors,
- Effectively managing the risks related to their field of activity,
- Working in compliance with relevant legal regulations and Datacore practices,
- Reporting any behavior, activity, or practice contrary to the Policy to the Ethics Committee.

5. Companies and Business Partners from Whom Goods and Services are Received and Sold

Companies and business partners from whom goods and services are received and sold must comply with the principles of the Policy and other relevant legal regulations, and those who do not comply will have their cooperation terminated.

5.1 Selection of Companies and Business Partners

In the selection process of companies and business partners from whom goods and services are received and sold, senior management considers criteria such as experience, financial performance, technical competence, as well as their ethical standards and positive history in this area. Companies or business partners with negative intelligence related to bribery or corruption are not worked with, even if they meet other criteria. The responsibility for necessary research and evaluations before entering any business relationship primarily lies with senior management. The Audit Department evaluates whether these issues are complied with during audits.

5.2 Agreement with Companies and Business Partners

Agreements and contracts with companies and business partners with positive intelligence and meeting other criteria should include provisions for:

- Full compliance with the principles stated in the Policy and other relevant regulations,
- Ensuring that their employees internalize and act in accordance with these principles,
- Providing training to their employees on the Policy at regular intervals,
- Regularly reminding their employees of their reporting obligations and the Ethics Line, and encouraging them to report if they encounter such situations.

Failure to comply with these conditions or any situation contrary to the Policy will result in the termination of cooperation and existing contracts for just cause.

6. Our Policies and Procedures

6.1 Bribery and Corruption

Datacore is against all forms of bribery and corruption. The receipt or giving of bribes, regardless of the purpose, is strictly prohibited.

Business relationships with third parties seeking to do business with Datacore through bribery or corruption should not be continued.

6.2 Gifts

A gift is a product that does not require a monetary payment and is generally given as a gesture of thanks or commercial courtesy by individuals or customers with whom there is a business relationship. Any gift offered or given by Datacore to third parties must be offered openly, in good faith, and unconditionally. The principles regarding the types of gifts that can be given and their recording are written in the Gift Acceptance and Giving Policy included in Datacore's Code of Business Ethics.

The same principles apply to the acceptance of gifts, and no gifts other than those of low material value and symbolic gifts specified in these principles should be accepted. Additionally, even in this context, the acceptance of gifts should not be frequent, and the recipient should report accepted gifts to the company HR and senior management through their immediate supervisor.

6.3 Facilitation Payments

Entities and individuals within the scope of this Policy are not allowed to offer facilitation payments to secure or expedite routine operations or processes (such as obtaining permits and licenses, acquiring documents, etc.) with government agencies.

6.4 Donations

The laws and regulations applicable to Datacore impose certain legal limitations on donations and aid. Accordingly, the prepared Donation and Aid Policy has been announced on the website and approved by the General Assembly.

Datacore employees supporting charities with amounts they have collected independently from their jobs are outside the scope of the Datacore Donation and Aid Policy. However, the principles included in Datacore's Code of Business Ethics also apply in this regard.

7. Accurate Record Keeping

The issues that Datacore's accounting and record system must comply with are regulated by legal regulations. Accordingly:

- All accounts, invoices, and documents related to relationships with third parties (customers, suppliers, etc.) must be recorded and maintained completely, accurately, and reliably,
- No alterations should be made to accounting or similar commercial records related to any transaction, and the facts should not be misrepresented.

8. Training and Communication

The Anti-Bribery and Corruption Policy has been communicated to Datacore employees and is continuously and easily accessible on the website and in shared area files.

Training is an important tool to increase employees' awareness. In this context, Datacore Human Resources designs training programs that all employees must participate in.

9. Reporting Policy Violations

If an employee or an individual acting on behalf of Datacore believes or suspects that a person has acted contrary to this Policy, it should be reported to the Ethics Committee. Issues related to the Datacore Code of Business Ethics are periodically reminded to Datacore employees. Datacore encourages honest and transparent approaches and supports any employee or individual acting on behalf of Datacore who sincerely expresses their concerns and keeps reports confidential. No employee can be subjected to pressure or punishment for reporting a violation of the Code of Ethics they believe to the Ethics Committee, and no changes can be made in their scope of duties or position for this reason without the written consent of the Ethics Committee.

If the reporting person faces such treatment, they should report it to the Ethics Committee.

Companies and business partners from whom goods and services are received must also regularly remind their employees about the Ethics Line and encourage them to report if they encounter such situations. This is also guaranteed by the contracts made.

10. Policy Violations

In cases of violations or potential violations of the Policy, the issue is reviewed by the Ethics Committee, and necessary sanctions are applied if inappropriate behavior is detected.

Contracts with companies and individuals from whom goods and services are received and individuals and organizations acting on behalf of Datacore include provisions that state that the work/ongoing contracts will be unilaterally terminated by Datacore for just cause if there is a violation or potential violation of the Policy, and these provisions are applied without exception in case of a Policy violation.