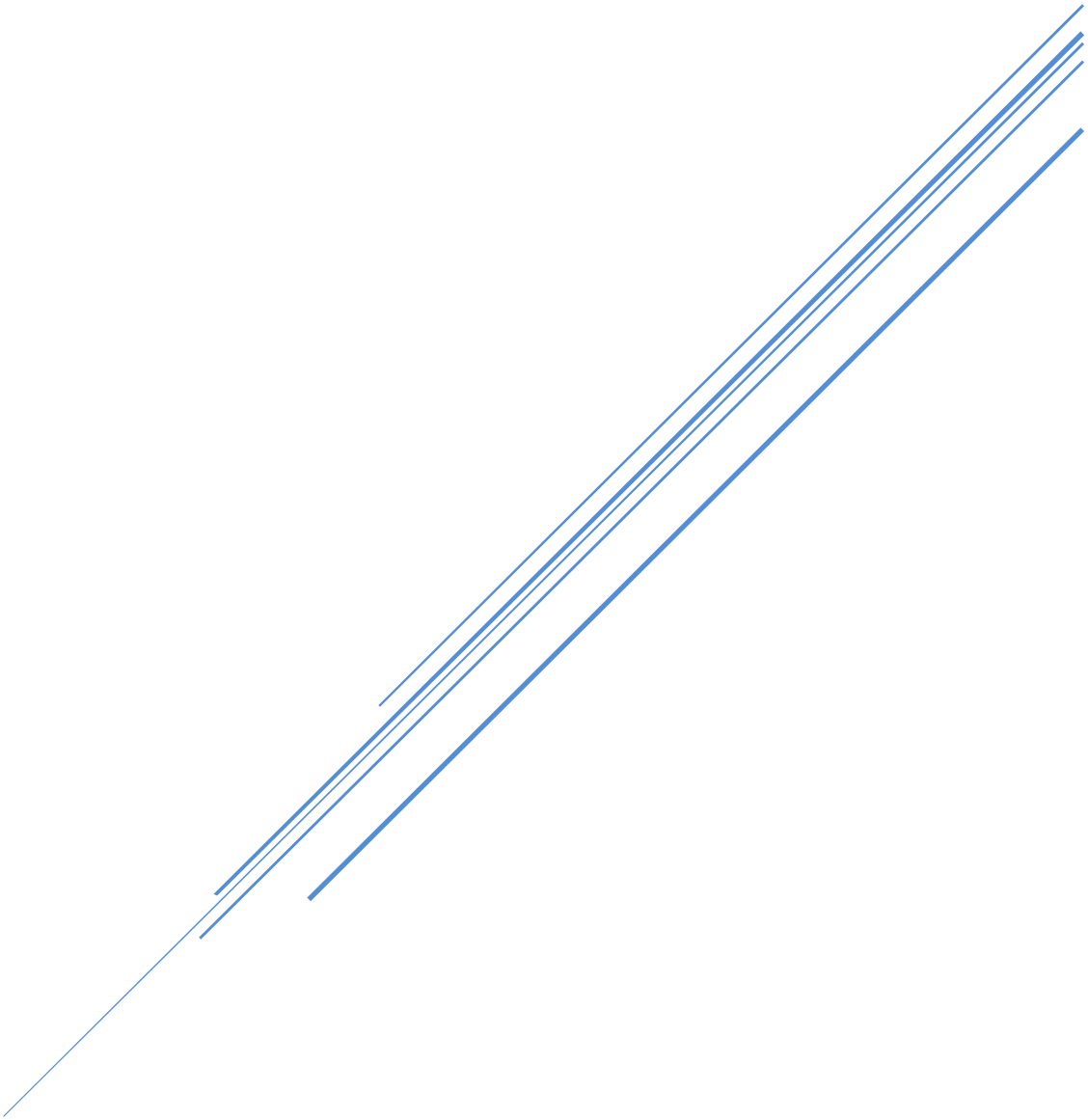
ORIGINAL

ER-KIM GLOBAL POLICY

GUIDELINES FOR INTERACTION WITH THIRD PARTIES



POL.LC.002-00-GL
Issue Date: 05/10/2022

Table of Contents

1. INTRODUCTION

ER-KIM[1] Code of Business Ethics and Anti-Corruption Policy clearly states the rules and standards that all employees and parties working or acting on behalf of ER-KIM must comply with.

This Guidelines for Interaction with Third Parties is designed to help you better understand laws, regulations, and company policies by setting out a set of guiding principles when interacting with Business Partner and external parties. These Guidelines set out the main principles to follow during interactions and, where necessary, will guide you in detail on the methods to refer to, the appropriate source of legislation, sectoral rules, or internal policies. This Guide also explains ER-KIM's principles as a company and your responsibilities as an employee.

GUIDING PRINCIPLES

The guidelines contained in this document are underpinned by two main principles:

- Transparency

All activities must be visible, documented, understandable and accountable. Our priority is to be honest and transparent about what, why and how we do it.

- Legitimate Purpose

All activities must have a legitimate purpose. It is important to consider these guiding principles when interacting with Business Partners and external parties to ensure that not only our activities as ER-KIM are appropriate and rational, but also the activities of the parties we interact with are appropriate.

The guidance and principles contained in this document have been written to help our employees to ensure compliance and proceed within ethical principles in their relations with all types of Business Partners and external parties, so that this Guide will serve as a guide for both healthcare professionals, healthcare institutions and organizations, Suppliers and Business Partners with whom we interact and for you, our employees, when acting on behalf of ER-KIM and/or doing business with ER-KIM.

2. SCOPE AND APPLICABILITY

This policy applies to all Members[2] or third parties connected with ER-KIM in any business relationship.

As used in this Policy;

- "Science service" means the unit established by the marketing authorization holder within its own organization, which ensures that the promotion of the products for which it holds a license

[1] "Er-Kim" or the "Company" refers to Er-Kim İlaç Sanayi ve Ticaret Anonim Şirketi ("Er-Kim Turkey") and its subsidiaries. "Affiliates" means a company directly or indirectly controlled by Er-Kim Turkey. For the purposes of the preceding sentence, "Control" means the power to hold, directly or indirectly, a majority of the voting shares of a company, or the power to exercise, directly or indirectly, by contract or otherwise, those rights, so as to influence the management and administration of the company.

[2] "Member" or "Members" refers to the senior executives, directors, managers, and employees of all Er-Kim Turkey and its affiliated companies.

or authorization is carried out in accordance with the provisions of the relevant legislation and where only physicians/dentists/pharmacists work,

- "Product(s)" includes all products marketed and sold by ER-KIM.
- "Promotion" includes all kinds of promotional activities for the preparation, prescription, supply, purchase, provision, recommendation or consumption of products.
- "Promotional Material" includes all audiovisual printed information, promotional brochures, packaging, packaging content, giveaways, internet announcements, publications, CDs, DVDs and all kinds of educational materials for Healthcare Professionals, consumers or representatives, if applicable, with the generally accepted definition, with the local legislation definitions of each country taking precedence.
- "Health institution/organization" refers to all public and private health institutions and organizations, universities, professional organizations of which healthcare professionals are members, trade unions, associations and foundations operating in the field of health, and non-governmental organizations established for the protection and promotion of health, with the generally accepted definition, with the local legislation definitions of each country being primarily valid.
- "Healthcare Professionals" means all members of the professions of medicine, pharmacy or nursing, or any person who prescribes, prepares, recommends or dispenses a product in the course of their professional activities, with the local regulatory definitions of each country taking precedence.
- "Business Partner" refers to the person or organization that ER-KIM has marketing and sales authority over the Product(s).
- "Third Party Service Providers" are persons or organizations that provide goods or services to ER-KIM.
- "Third Parties" means any person or organization you come into contact with while working for ER-KIM, including actual or potential customers, suppliers, distributors, business contacts, agents, consultants, public and official institutions and their consultants, representatives, officials, politicians and political parties.

1. PROMOTIONAL MATERIALS AND ACTIVITIES

The following principles should be adopted in the development and use of promotional materials:

1. All employees involved in product promotion activities and the production of promotional materials must be fully trained and aware of the relevant laws, regulations and industry rules and requirements, as well as the relevant ER-KIM policies and procedures. It is prohibited to promote and/or market a product without a license/permit. Once a marketing authorization/permit has been obtained, products may only be promoted as approved by regulatory authorities and listed in the short product information.
2. All promotional materials must comply with the approved short product information and be reviewed by the Science Service.

3. All promotional materials and activities must be objective, accurate, balanced and in accordance with the high standards of ER-KIM and its Business Partners and must comply with local legislation.

4. Promotional materials must contain all kinds of mandatory information, especially the prescription information of the product within the scope of the rules and legislation related to the sector.

5. Promotional materials should be reviewed regularly to ensure that all materials comply with the latest updated requirements, taking into account, for example, the release of new data or the launch of a new competitor. All expired material must be withdrawn from the market and replaced with updated material in accordance with the relevant procedure.

6. At no point can the promotion contain confidential information or be misleading.

7. Promotional activity may only be directed to Healthcare Professionals who have a need or interest in the information or who are reasonably presumed to have a need or interest. The frequency of promotion and the content of promotional material should be reasonable and in line with industry guidelines.

2. INTERNET AND SOCIAL MEDIA

2.1. INTERNET

Promotional information and materials provided to Healthcare Professionals over the Internet, like all other promotional materials, must comply with the relevant laws, legislation and sector rules, international legislation, as well as the relevant ER-KIM policies and procedures. It should be clarified on the site for which jurisdiction this information is intended.

Products may not be promoted directly or indirectly to the public through programs, films, series of films, news and similar means in media and communication media open to public broadcasting, including the internet.

2.2. SOCIAL MEDIA

The use of social media such as LinkedIn, YouTube, Facebook, Twitter and blogs to communicate and interact with Healthcare Professionals or Business Associates, as applicable, is subject to the same professional communication and promotion policies, laws and regulatory requirements as print media. The use of social media for business communication is only possible by logging in from the Company account and not from personal accounts. Confidential information related to the Company's business may never be shared on the internet or made public by any means. This includes, but is not limited to, any social networking media and chat rooms, electronic newsletters, blogs, etc. and any internet-based forums.

As a rule, prescription medicines may not be publicly promoted on social media and no advice or guidance on treatment may be given. If an adverse event notification is received via social media, this process will be handled according to the adverse event reporting process.

When the need arises to utilize social media to communicate and interact with Healthcare Professionals or, if applicable, Business Associates, employees should contact the company's Legal and Compliance Department.

3. VALUE TRANSFERS

Transfers of value made by ER-KIM to health institutions and organizations, universities, healthcare professionals, and professional organizations of which they are members, trade unions, associations, and foundations operating in the field of health and non-governmental organizations established for the protection and promotion of health should be declared in accordance with local requirements.

ER-KIM must document and declare any direct or indirect transfer of value to any Healthcare Professional or Healthcare Institution/Organization in accordance with the requirements. These statements are made in accordance with the local legislation applicable to ER-KIM Turkey and each of its Affiliates.

3.1. SERVICE CONTRACTS

ER-KIM may engage a Healthcare Professional to provide paid or unpaid services to meet its legitimate business needs.

In accordance with international standards and for the purpose of protecting and promoting health, the areas where ER-KIM may enter into financial transactions with a Healthcare Professional are as follows in general terms, provided that the more restrictive definitions of local legislation are accepted as the basis for the relevant region:

- Consultancy Meetings
- Speaker Services at Conferences and Congresses
- In-House Trainings
- Product Promotion Meetings
- Satellite Symposia
- Research Projects
- Expert Opinion

The following principles should always be followed when engaging a Healthcare Professional to provide services;

1. The Healthcare Professional must have the competence and special expertise to provide the required services.

2. The service and/or support provided must meet a legitimate business need/purpose and not be conditional on the other party prescribing in favor of ER-KIM or promoting its Products.

3. All sponsorship, consultancy and speaker services must be documented in a written contract. Except for the sections left blank to be filled in by the relevant departments, no changes, additions/subtractions and/or deletions should be made on the current contract drafts without the written approval of the Legal and Compliance Department.

4. All known actual or potential conflicts of interest should be documented by the entity and investigative activity should be undertaken to demonstrate that this has been properly assessed.

5. The relevant legal documents should include requirements to ensure transparency between contractual parties and/or to third parties and should specify that the relevant HCPs should immediately inform ER-KIM if they obtain a position that may adversely affect ER-KIM while providing their services to ER-KIM.

6. Fees and costs paid must be reasonable and based on fair market rates.

7. Evidence that the service was actually performed must be provided and documented before the invoice for these services can be paid.

Please contact the Legal and Compliance Department for any additional advice and information.

FREE CONTRACTS

If a Healthcare Professional undertakes to work free of charge or to waive his/her fee, a written contract must be made stating the details of the service to be provided and that the service will be a free service, regardless of the fee obligation.

3.2. EDUCATIONAL SPONSORSHIP

ORGANIZATION AND SPONSORSHIP ACTIVITIES

ER-KIM may organize and sponsor scientific and educational events, alone or jointly. The criteria for which activities will be sponsored and to what extent and in what manner should be documented. Such activities can be supported by direct funding or by providing technical assistance or training materials. The main purpose of these activities should be educational and in line with local legislation and sector standards.

SPONSORSHIP OF PARTICIPATION IN EVENTS

Healthcare Professionals can be supported by ER-KIM to participate in congresses and events. ER-KIM may cover sponsorship registration fees, travel, accommodation, and hospitality expenses in accordance with local legislation and internal rules. In sponsorship processes, there must be a written contract with the Health Institution/Organization organizing the event and the sponsored Healthcare Professional.

3.3. CROSS-BORDER ACTIVITIES

Activities performed in countries other than the country where Healthcare Professionals are subject to or services in countries where Healthcare Professionals temporarily go to provide services will be considered as cross-border activities. When providing sponsorship for cross-border activities, both the country of the participant and the legislation of the country where the activity will be offered should be considered together.

3.4. DONATIONS AND GRANTS

The Company may make donations and grants to encourage and support publicly beneficial activities such as education, health, culture-arts, law, scientific research, environmental protection, sports, socialization of the disabled, entrepreneurship, technology, communication and similar publicly beneficial activities through gratuitous donations by meeting social needs and contributing to the future and development of the country within the awareness of social and corporate responsibility.

As a priority criterion, it may be considered that the individuals and organizations to be donated to are reliable, reputable, and accepted in society for their activities. However, it is also possible to support activities that young people and individuals, and organizations that will operate in accordance with these principles are just starting or are about to start.

Donations and grants should be made to public institutions and organizations and non-profit organizations and should be within the scope of ER-KIM's standard operating procedures, this Guide and local legislation. Below are the key principles to consider:

- All support, whether proactive or reactive, should be documented and the nature, purpose and amount of the contribution should be specified.
- The Board of Directors is the final decision-maker on all donations and grants. The total limit of donations to be made within an accounting period is determined by the Board of Directors.
- All donations, aid and scholarships are recorded in the official records of the Company. Donations and grants made by the Company may not exceed 1% of the total assets of the last balance sheet.
- All donations and grants require a signed contract prepared by the Legal and Compliance Department.
- A due diligence assessment should be conducted by the Legal and Compliance Department to ensure that donations and grants are legitimate and do not lead to any potential conflict of interest.
- Aids must under no circumstances be intended to provide ER-KİM with any interest or benefit.

All donations and aid made upon the decision of the Board of Directors are made in accordance with our vision, mission, and policies and in consideration of ethical principles.

PRODUCT DONATIONS

Donations of medicinal products for human use can usually be made in acute emergency situations, in accordance with the legal framework. It is also possible to donate products to support a clinical trial/study. The following basic principles should be considered for product donations:

- It should provide high-level benefits for health and research;
- Product donation must be made in accordance with the recipient's request and authorization and legal regulations;
- There should be no double standards in quality requirements;
- There should be written, traceable and transparent process tracking and communication.

Product donations are made in accordance with the established framework of legal obligations and internal processes and in accordance with the World Health Organization (WHO) Guidelines for Product Donations.

In order to prevent unfair competition or unethical practices, all product donations must be justified in writing, necessity/need must be supported by evidence and a transparent process must be followed in accordance with legal requirements.

4. RESEARCH

4.1. RESEARCHER INITIATED STUDIES

ER-KIM can support clinical investigator-initiated studies in accordance with local legislation, and this support can be provided in a number of ways, depending on the nature of the request. The appropriate Company procedure should be followed according to the nature of the request.

4.2. CLINICAL RESEARCH AND STUDIES INITIATED BY THE COMPANY

Clinical trials should be conducted according to approved standards and in line with scientific principles. The development, promotion and clinical trials of the new product should be carried out in accordance with the International Council for the Harmonization of Technical Requirements for Medicinal Products for Human Use (ICH) Guidelines, Good Clinical Practice (GCP), Good Pharmacovigilance Practice, Good Manufacturing Practice (GMP), Good Laboratory Practice (GLP) and applicable local legislation.

Clinical research activities are conducted according to the institutional processes and procedures in the Quality Management System. These are:

- Completion of regulatory and ethical approvals
- Management of Third-Party Service Providers, preparation of appropriate contracts and financial management
- Study management, medical monitoring and adverse event reporting

4.3. RESEARCH DONATIONS

The following points should be taken into account when requesting research support:

- The request for support should be made in writing and include full details of the research, including aims and methodology.
- The granting of support cannot be conditional on the purchase or prescription of ER-KIM products.
- Requests for research support must always be reviewed and approved by the Ethics and Compliance Committee before any agreement is reached.
- No support can be given without a written agreement.
- The agreed level of support should be set, payments should be phased in, properly documented, and reflect market prices.

- Any adverse event interviewed or reported during the research should be followed up according to the rules in ER-KIM's standard operating procedure.

4.4. FREE PRODUCT

SAMPLES

Where the distribution of pharmaceutical samples is authorized, the following principles should be followed, without prejudice to the provisions of the relevant regulation on the sale, advertising and promotion of medical devices, medicinal products for human use or other products and taking into account local requirements:

- Pharmaceutical samples are provided to healthcare professionals to learn about products; the number of samples provided should be limited to the number needed to fulfill this purpose and should comply with industry rules and regulations.

- All samples must be labeled "Demonstration Sample, Not for Sale" and must be accompanied by a copy of the short product information.

- Under no circumstances may samples of controlled products be distributed.

EARLY ENTRY PROGRAM FOR HUMANITARIAN MEDICINES

In exceptional cases, if suitable alternative treatment options are not available, local regulatory arrangements may allow the importation of products without regulatory approval. In such cases, local requirements should be taken into account and internal and external regulations should be followed.

5. CONSIDERATIONS WHEN WORKING WITH PUBLIC INSTITUTIONS AND ORGANIZATIONS

Public Institutions and Organizations play an important role in society at large and in the pharmaceutical sector in key issues such as citizens' access to health services, ensuring economic stability and social order, and the safe use of medicines. For all these reasons, ER-KİM approaches all its relations with Public Institutions and Organizations with care and attention.

In this direction, ER-KIM Employees;

- Must always clearly and accurately identify themselves as ER-KIM representatives and act in accordance with the requirements of their duties.

- May proactively establish dialogue and cooperation with Public Institutions and Organizations, provided that it is necessary, appropriate and provides a legitimate benefit within the framework of the law.

- Adhere to the principle of honesty and integrity in all interactions with Public Institutions and Organizations, adopt a transparent and responsible behavior, and comply with all applicable local, national and international laws and requirements, including but not limited to the specified provisions.

- Reject any improper behavior, corruption or illegitimate advantage that may affect its relations with Public Institutions and Organizations.

- Take all necessary measures and actions to ensure the accuracy and timeliness of all statements made or information provided by them.

- Act in accordance with the principles of transparency and honesty in negotiations with Public Institutions and Organizations, and cannot offer or offer any material or immaterial benefit.

6. THIRD PARTY SERVICE PROVIDERS

Third Party Service Providers are third parties or organizations that are not an organic part of ER-KIM or its employers and provide supply services to ER-KIM.

Third Party Service Providers can be categorized into 2 groups:

- Third party vendors
- Third party intermediaries

6.1. THIRD PARTY VENDORS

They typically provide products or services to ER-KIM but in no way act on behalf of ER-KIM. Some examples are given below:

- Consulting services,
- Archive services,
- Printing services,
- Food services,
- Courier services

In one-off business relationships with Third Party Vendors, it is mandatory to sign a contract if the contract value exceeds 50% (fifty percent) of the gross minimum wage in force. In permanent employment relationships, the signing of a contract is mandatory regardless of the amount.

CONSIDERATIONS WHEN WORKING WITH THIRD PARTY VENDORS

1. Documented business justification

2. Bids from at least 3 (three) different places

3. 3rd Party Seller is required to submit at least the following documents for legal due diligence

   (i) Certificate of Activity,
   (ii) Signature Circular (It must be checked whether the parties signing the contract are authorized to sign),
   (iii) Tax Plate (3. If the financial viability of the party is material)

4. Contract or standard terms and conditions (Third Party Vendors should not start work before the contract is signed.)

These issues are not limited to those listed and additional documents may be requested to be submitted according to the necessity of the situation and the nature of the seller.

6.2. THIRD PARTY INTERMEDIARIES

They typically represent the Company or act on behalf of the Company. Some examples of Third-Party Intermediaries are as follows:

- Distributors
- Lobbyists
- Legal services (limited to proxy relationship),
- Regulatory approval bodies,
- Clinical research organizations,
- Customs brokers,

CONSIDERATIONS WHEN WORKING WITH THIRD PARTY INTERMEDIARIES

1. Documentation of the business justification

2. Due Diligence

3. Contract or standard terms and conditions (Third Party Intermediaries should not start work before the contract is signed)

4. The 3rd Party Intermediary must submit at least the following documents for legal due diligence

   (i) Certificate of Activity,
   (ii) Signature Circular (It must be checked whether the parties signing the contract are authorized to sign),
   (iii) Tax Plate (3. If the financial viability of the party is material)

5. Coordination and Communication

Due Diligence is carried out jointly by the Legal and Compliance Department and the Procurement Department, and the documents to be reviewed are determined by the decision of these departments.

In cases where a supply service relationship is entered into with multinational companies, there may be situations where the ER-KIM standard contract draft is not accepted. In these cases, action should be taken with the guidance of the Legal and Compliance Department and by making a risk assessment according to the nature of the business relationship to be entered into with Third Party Service Providers.

7. REGULATORY AUTHORITIES AND INSPECTION BODIES

ER-KIM will routinely engage with regulatory and inspection bodies for a number of reasons, including returns, clinical trials, GMP, product registration and pharmacovigilance. In these interactions, employees must follow the relevant established procedures and the guidelines in section 7.

If the relationship involves an inspection, the following steps should be taken:

- At least two (2) ER-KIM employees must be present in such cases.

- Depending on the type and subject of the inspection, specialized and responsible employee(s) must be present.
- Ensure that the inspection team is authorized and assigned for the relevant inspection.
- Inspection officers must always be accompanied by an ER-KIM staff member.
- If inspections have not been announced, the Chairman of the Board of Directors should be immediately notified and the Company's Legal and Compliance Department should be consulted.

8. PATIENT ORGANIZATIONS

ER-KIM may establish relationships with legitimate patient organizations in order to provide support and appropriate information, provided that it is within the framework of the relevant legislation and laws.

The following principles should be followed when engaging with patient organizations:

- All relationships must have a legitimate purpose and this purpose must be properly documented and published.
- While conducting these relations, product promotion and advertising should be avoided.
- There should be a written agreement that includes the details, nature, quantity and purpose of the support provided to the patient organization.
- Relations with Patient Associations must under no circumstances serve the purpose of promoting and/or communicating with patients.

9. EXTERNAL COMMUNICATION

9.1. COMMUNICATION WITH MEDIA

In case of any contact with the media or any request for information by the media, the representation and binding authority(ies) of the relevant region should be contacted and written confirmation should be obtained.

9.2. QUERIES

Patients or citizens seeking medical advice by calling ER-KIM should be advised to consult their own doctor. Requests for information and inquiries from the commercial or educational fields should be in writing and directed to the Science Service of the relevant region.

10. PERSONAL RELATIONS WITH EXTERNAL PARTIES

All personal relationships with Business Partners or suppliers must be disclosed in writing to the immediate supervisor and the nature of the relationship must be specified to avoid any perception of conflict of interest. If a conflict-of-interest situation exists, mitigation activities must be carried out and documented to protect ER-KIM and related persons. Employees should refrain from discussing business

matters in social environments and personal relationships and personal relationships should not be used to obtain a business benefit on behalf of ER-KİM. For advice on individual situations, please consult your Department Supervisor and the Legal and Compliance Department.

11. CONFLICT OF INTEREST

Conflict of interest refers to situations that negatively affect a person's ability to fulfill his/her responsibilities and duties for Er-Kim in an objective manner. The other party does not have to be a public official for a conflict of interest to arise. The risk of conflict of interest can arise in various ways when interacting with third parties.

Employees must report and request approval for the following situations:

- While continuing to work for ER-KIM, taking a position as an officer or consultant in a government agency that has regulatory or supervisory authority over ER-KIM,
- Holding shares in any organization that is a supplier, customer or competitor of ER-KIM while continuing to work for ER-KIM,
- To be a member of the board of directors, scientific advisory board or similar boards in another institution while continuing to work within ER-KIM,
- The ER-KIM employee has a family member who works as an officer or consultant in a public institution with regulatory or supervisory authority over ER-KIM,
- ER-KIM employee has a family member who owns 5% or more of the shares of any organization that is a supplier, customer or competitor of ER-KIM.

12. FAIR COMPETITION

International competition rules control anticompetitive, distortive and restrictive agreements, practices and decisions made by undertakings operating in goods and services markets, abuse of dominance by undertakings in a dominant position in the market, and mergers and acquisitions that create a dominant position in the markets or strengthen an existing dominant position.

In the event of a violation of competition legislation, companies and their employees may have to pay heavy fines and damages, and their reputations may be adversely affected. In some countries, even imprisonment may be on the agenda for employees. For this reason, ER-KIM expects its employees and Third Parties not to take actions that may be contrary to competition legislation. The following are the most prominent of these actions, taking into account the strict rules of each region:

- Agreements or negotiations with competitors or parties at different levels of the production or distribution chain, such as customers, services, suppliers, etc., that may limit competition,
- Giving confidential information to competitors or receiving confidential information from competitors,
- Abuse of dominant position.

13. SALES REPRESENTATIVES

All representatives will be certified to ensure that they receive appropriate training and have the necessary product and clinical knowledge to perform their duties as required. Training attendance must always be evidenced in writing. Representatives must also be familiar with all relevant ER-KIM policies and procedures and applicable laws and regulations and this Guide. Training of sales representatives should be ongoing and the content and supporting materials used should be regularly reviewed and updated.

Sales representatives should be fully trained in adverse event reporting and should report without delay any feedback received on the product.

14. RECORD KEEPING

All investigations conducted under this Policy are recorded in writing by the Legal and Compliance Department.

15. YOUR RESPONSIBILITIES

ER-KİM expects its employees to receive all necessary training. With reference to this Guide, employees are expected to:

- Read and understand this Guide,
- Participate in training related to this Guide,
- Reviewing and, where necessary, referring to relevant policies and procedures.

All employees are responsible for the daily monitoring of this policy and compliance with its content. Members of the Board of Directors, managers and those authorized to sign on behalf of ER-KIM are responsible for fulfilling the legal and ethical obligations of this policy and for ensuring that those under their control comply with this policy. Violation of this Policy may result in various sanctions, including termination of employment.

16. VOICING A PROBLEM

ER-KIM expects all employees to bring such information to the attention of the Company in accordance with the Code of Business Ethics in the event that they suspect that laws, Company policies or industry rules have been violated by any employee or agent of the Company. You must disclose the matter without delay, regardless of the identity or position of the suspect in question.

If a violation of a law involves possible criminal activity, failure to report may itself amount to condoning crime under the law. Therefore, we would like to emphasize the importance of reporting. Regardless of the reporting method, it is important that you bring any issues to ER-KIM's attention.

Such cases can be communicated to the following departments:

- Your First Supervisor,
- Your Department Head,
- Legal and Compliance Department

Applications can be made to the Company's Legal and Compliance Department at etik@er-kim.com.tr, as described in the Notification, Consultation and Whistleblowing Policy and Procedure. Alternatively, it can be reported anonymously through the Ethics Hotline (+90 212 401 59 19). Please refer to the Notice and Whistleblowing Policy for more details.

Reports of suspected violations of laws, company policies and industry rules will be thoroughly and impartially investigated under the direction of the Legal and Compliance Department. The investigation may include interviews with those involved and, where necessary, may also include interviews with

those who have observed or have knowledge of the allegation in question. Everyone is expected to cooperate with the investigation.

17. PROTECTION

Retaliation of any kind against a person who in good faith reports a suspected violation of law, Company policies or industry rules, or against someone who assists in investigations, is itself a serious violation of the Code of Business Conduct and the Anti-Retaliation Policy. An example of retaliation could be dismissal, disciplinary action, threats or negative behavior in relation to raising an issue. ER-KIM will not tolerate such actions and such actions must be reported immediately. If you believe you have been subjected to such treatment, you should immediately report it to a member of the local management team with whom you are most comfortable in accordance with our Anti-Retaliation Policy. If the matter is not resolved, you should report it separately to the Legal and Compliance Department.

18. TRAINING AND COMMUNICATION

The Legal and Compliance Department is responsible for ensuring that this policy is understood and that adequate and regular training is provided on this topic. Training in this policy forms part of the orientation period for all new staff. All existing staff will receive regular training on how to implement and comply with this policy.

Our zero-tolerance approach to bribery and corruption must be emphasized and communicated to all Third-Party Vendors and Third-Party Intermediaries at the outset of our business relationships and, as appropriate, at later stages.

In accordance with the principle of continuous improvement, ER-KIM will be in constant communication and discussion with its employees in order to understand this Guide and to develop and improve it in the future.

19. MONITORING AND REVIEW

The Legal and Compliance Department will regularly monitor and review the implementation of this policy, measuring its effectiveness, appropriateness and adequacy. Any improvements to be identified in line with the principle of continuous improvement will be made as soon as possible.

Staff are asked to comment on this policy and make suggestions on how to improve it. Such comments, suggestions and questions should be directed to the Legal and Compliance Department. This policy does not constitute a part of the employee's employment contract and may be changed by ER-KIM at any time.

ANNEX 1 DOCUMENT HISTORY AND VERSION CONTROL RECORD

Document Name	Guideline for Interactions with Third Parties
Author	Bilge KIYAK, Legal and Compliance Manager
Approved by	CEM ZORLULAR, Chairman of the Board
Published by	Ahu, ÖZGÜR, Quality Manager
Approval Date	May 9, 2022
Review Date	-
Review period	2 years
Next Revision Date	May, 2024

Version No	Version Date	Amendment details
00	November 5, 2019	Customer and 3. Party Relations Policy First Edition,
01	December 23, 2019	Changes in title and preparing party
02	September 29, 2020	Customer and 3. The Party Relations Policy was repealed as it was not sufficient to meet the need. This policy has been established.
00	May 9, 2022	The numbering system changed in accordance with DK-2022-0001. The Guidelines for Interaction with Third Parties were revised to apply to all ER-KIM Affiliates and to include the Donation Policy, Fair Competition Policy and Conflict of Interest Prevention Policy.