

Doc Title	Alt_Tr_Std_Ext_Comp_Altium Türkiye Compliance Policy
Version	1.0
Valid From	19.07.2023
Classification	External

1 Compliance Policy

Altium International Laboratuvar Cihazları A.Ş. (from now on referred to as Altium Türkiye) is committed to doing business by the highest standards of business conduct and ethics, and we consider our reputation for ethical and compliant behavior a valuable corporate asset.

1.1 Introduction

1.1.1 Policy Owner: Altium International Compliance Department

1.1.2 Last Revision Date: 02.07.2023

2 Scope

This policy applies to all employees, contractors, and third parties acting on behalf of Altium Türkiye. It covers all aspects of business operations and outlines the standards of conduct expected from individuals associated with the company.

3 Policy Framework

Altium Türkiye declares that the company is complying with all applicable.

3.1 Legal and Regulatory Compliance

- *Tax laws and reporting requirements*
- *Industry-specific regulations (e.g., financial services, healthcare, data protection)*
- *Environmental regulations*
- *Consumer protection laws*
- *Import/export laws*

3.2 Code of Conduct

- *Integrity and honesty in all business dealings*
- *Respect for employees, customers, and stakeholders*
- *Commitment to diversity and inclusion*
- *Prohibition of discrimination and harassment*
- *Responsible use of company resources*
- *Avoidance of conflicts of interest*

3.3 Data Privacy and Security

- *Data classification and handling procedures*
- *Data access controls and permissions*
- *Data breach response and notification process*
- *Employee training on data privacy best practices*
- *Compliance with applicable data protection laws (e.g., KVKK, GDPR)*

3.4 Anti-Bribery and Corruption

- *Prohibition of offering or accepting bribes or kickbacks*
- *Due diligence requirements for third-party partners*
- *Gifts and entertainment policy*
- *Reporting suspicious activities or requests for bribes*

3.5 Conflicts of Interest

- *Disclosure requirements for potential conflicts*
- *Procedures for handling conflicts in decision-making*
- *Steps to avoid situations that could create conflicts.*

3.6 Health and Safety

- *Safety training and emergency response procedures*
- *Personal protective equipment (PPE) requirements*
- *Reporting of accidents and incidents*
- *Occupational health programs*

3.7 Environmental Responsibility

- *Recycling and waste reduction initiatives*
- *Energy conservation efforts*
- *Sustainable sourcing and supply chain practices*
- *Compliance with environmental regulations*

4 Organization and Responsibilities

Altium Türkiye Compliance and Ethics Organization conducts activities in four groups.

- **Compliance Managers** include the Board President, General Manager, Group Managers, Quality Assurance, Finance Manager, Compliance Manager, Compliance Specialist, and HR Manager.
- **The Compliance Enforcement Team** comprises the General Manager, Compliance Manager, and Compliance Specialist.

- *The Compliance Red Flag Solution Team comprises General Manager, Compliance Manager, Compliance Specialist, Department Managers, and Finance Manager.*
- *Compliance Responsible are all Altium Türkiye employees.*

4.1 Management Responsibilities

4.1.1 Setting the Tone at the Top

- *Managers and senior leaders are responsible for exemplifying the highest standards of ethical conduct and compliance with all policies and regulations.*
- *They must demonstrate a commitment to integrity, honesty, and transparency in all business dealings, setting the tone for ethical behavior throughout the organization.*
- *Leading by example, managers should promote a culture that encourages employees to voice concerns and report potential compliance issues without fear of reprisal.*

4.1.2 Tracking Awareness and Understanding

- *Managers must regularly assess compliance awareness and understanding among their team members.*
- *This could involve conducting surveys, hosting feedback sessions, or engaging in one-on-one discussions with employees.*
- *If knowledge gaps are identified, managers should work with the compliance team to address these gaps and provide additional training or support.*

4.1.3 Addressing Non-Compliance and Ethical Concerns

- *Managers are responsible for promptly addressing non-compliance or ethical concerns within their teams.*
- *They should ensure that proper channels for reporting violations are communicated and that employees feel safe reporting concerns.*
- *In case of a potential compliance breach, managers must collaborate with the HR or compliance department to conduct investigations and take appropriate corrective actions.*

4.1.4 Participating in Compliance Initiatives

- *Managers should actively participate in company-wide compliance initiatives and campaigns.*
- *They must promote specific compliance programs, such as anti-bribery or data protection initiatives, within their teams.*
- *Managers should also support and contribute to developing and improving compliance policies and procedures.*

4.1.5 Monitoring and Reporting

- *Managers monitor their team's adherence to compliance policies and procedures.*
- *They should regularly report on compliance performance to higher management and the compliance department.*
- *If any compliance issues or risks are identified, managers must take appropriate actions to address them and implement measures to prevent recurrence.*

4.2 Compliance Enforcement Team's Responsibilities

4.2.1 Cultivating a Culture of Compliance

- *The Compliance Department is accountable for fostering a culture of compliance within their respective teams and departments.*
- *They must communicate the importance of compliance and ethics, emphasizing each team member's role in upholding the company's values.*
- *Promoting open communication, the compliance department should encourage employees to seek guidance when facing compliance-related questions or dilemmas.*

4.2.2 Providing Adequate Training and Resources

- *The Compliance Department ensures that all company members receive appropriate compliance training relevant to their roles.*
- *They should collaborate with the department managers to identify training needs and schedule periodic training sessions.*
- *The Compliance Department must provide employees access to compliance policies, procedures, and resources, making staying informed and up-to-date accessible.*

4.3 Compliance Red Flag Solution Team's Responsibilities

Suppose any compliance issues or risks are identified. In that case, the Compliance Red Flag Solution Team must handle the reported issues, take appropriate actions to address them, and implement measures to prevent recurrence.

4.4 Employee Responsibilities

All persons shall immediately report any incident of non-compliance of which they gain knowledge and which affects, or may affect, the activity of Altium Türkiye. In this regard, events that may have a financial, material, or reputational impact on the company are considered non-compliant incidents.

5 Training and Education

All subjected compliance policies, procedures, and resources are placed on our website (<https://www.sem.com.tr/compliance>) and kept updated.



6 Communication

The following are key contacts in respect of this policy.

compliance.tr@altium.net

legal.tr@altium.net

7 Reporting Points

- *Suppose an Altium employee believes in good faith that a rule or principle is being violated or is about to be broken. In that case, they should report it to their manager, their manager's manager (who may inform the Compliance Enforcement Team), or directly to the Compliance Enforcement Team.*
- *Reporting anonymously is possible but not encouraged. However, the identity of the person making the report will only be disclosed within the Compliance Red Flag Solution Team and kept confidential otherwise. Providing your name when making a report will assist Altium in protecting you from retaliation and seeking additional information from you.*
- *If you have any concerns regarding specific breaches of this policy, you can contact the above.*