



**KOLUMAN
CONFLICTS OF INTEREST, GIFTS,
HOSPITALITY, DONATIONS, AND
SPONSORSHIP POLICY**



1. Purpose and Scope

Koluman Holding expects its employees and managers to prioritise the company's interests over personal or third-party interests, based on the principles of transparency, integrity and accountability in all business processes. Conflicts of interest can undermine impartiality in business processes, negatively affecting the company's credibility and business ethics. This policy has been established to ensure that employees and managers remain impartial in decision-making processes, to prevent the misuse of company assets, and to guarantee that business relationships are conducted in accordance with the principles of honesty and fairness.

This policy covers Koluman Holding employees, managers, affiliates, business partners, dealers, suppliers and contractors, and applies in all regions where the company operates.

Koluman Holding implements measures to prevent any situations where a conflict may arise between the personal interests of its employees or managers and the interests of the company, and takes the necessary action should such situations arise.

2. Basic Principles for Preventing Conflicts of Interest

Koluman Holding expects all employees and managers to prioritise the company's interests when performing their duties, to refrain from acting in their personal interests, and to be fair, ethical and impartial in decision-making processes. In this regard, the following fundamental principles have been adopted:

Employees and managers must always prioritise the company's interests and must not use their authority or corporate resources for personal gain.

Ethical values and transparency must be fundamental in business relationships, and impartiality must be maintained in decision-making processes.

The company's tangible and intangible assets, authority or corporate relationships must not be used for personal gain.

In commercial relationships with third parties, any benefit (gift, discount, privilege, etc.) that could influence decisions should not be accepted or offered.

Any situation that could lead to a conflict of interest must be reported immediately to the relevant compliance units in accordance with the principle of transparency.

Koluman Holding expects its employees and managers to fully comply with the company's ethical principles and to take responsibility for preventing conflicts of interest.

3. Gifts and Hospitality

Gift-giving and hospitality practices, while a common tradition in the business world, can influence impartial decision-making processes and create an unethical conflict of interest when provided beyond certain limits. Koluman Holding expects all its employees to act transparently, impartially, and within ethical guidelines in commercial relationships and to comply with the established rules regarding the acceptance of gifts.

3.1. Gifts That Cannot Be Accepted

The following types of gifts are strictly prohibited:

- Cash, cheques, foreign currency, securities or similar gifts of monetary value.
- Gifts of high material value such as gold, jewellery, expensive watches or luxury items.
- Gift vouchers, discount coupons or special benefits that grant any privilege.
- Gifts related to gambling, betting or games of chance.
- High-cost hospitality and travel offers such as airline tickets, holiday packages or five-star hotel stays.
- Any gifts given in connection with public procurement processes or that could influence commercial decisions.
- Offers to pay the personal debts of Koluman Holding employees or provide them with financial assistance.
- Expensive entertainment events provided by suppliers, customers or business partners (VIP concert tickets, special celebrations, spa services, etc.).

3.2. Acceptable Gifts

The following types of gifts are acceptable within reasonable limits:

- Promotional gifts of symbolic value (such as diaries, calendars, pens, plaques, and other items bearing corporate branding).
- Clothing, accessories, etc., costing no more than €75.
- Small gifts within a reasonable price range (e.g., a cup of coffee, a small gift package, etc.).
- Awards and commemorative items received in the context of events or industry gatherings attended by the company.
- Gifts traditionally given on official holidays or special occasions that are consistent with company policies.

3.3. Gift Giving Policy

Koluman Holding employees and managers must adhere to the following rules when giving gifts to third parties:

- Gifts must be given in a manner that does not compromise the impartiality of the business relationship.
- The gift-giving process must be conducted in accordance with the company's ethical principles and legal regulations.
- The gift must be considered a corporate gesture on behalf of the company and must not provide personal benefit.
- The gift must not be presented in a manner that could influence commercial decisions or create obligations for the recipient.
- Gift-giving processes must be recorded in the company's internal reporting system.

3.4. Hospitality and Dinner Invitations

Koluman Holding acknowledges that dinner invitations and hospitality practices are common in the business world for the purpose of developing business relationships, but emphasises that such events should not influence business decisions or compromise impartiality.

In this context:

Hospitality and dinner invitations should be for business purposes and should not involve excessive luxury or unusual expenses.

Invitations should be appropriate to the nature of the business relationship and organised in a manner that preserves impartiality.

Dinner or event invitations should be commensurate with the requirements of the commercial relationship and should not influence decision-making processes.

Invitations involving private travel, accommodation or entertainment activities should only be considered if they are for business purposes and should be accepted with the approval of the relevant manager.

With regard to dinner invitations or hospitality for public officials, full compliance with the relevant legislation should be ensured and actions should be taken within the framework of ethical rules.

4. Sponsorship

Koluman Holding conducts its sponsorship activities in line with the company's values and business strategies, embracing the principles of impartiality and transparency in its sponsorship processes. It is unacceptable for sponsorship activities to be conducted in a manner that could influence the company's commercial decisions or compromise the principle of impartiality. Sponsorship activities may only be carried out in areas such as corporate social responsibility projects, arts, culture, sports, environment and education. Sponsorships that conflict with the company's ethical principles, may cause conflicts of interest or lead to a loss of public reputation should be avoided.

Sponsorships must be transparent, all processes must be recorded, and they must be carried out with management approval. Sponsorship support cannot be provided in a manner that benefits a public official, political figure, or individual.

5. Aid and Donations

Koluman Holding makes donations and contributions to organisations that support education, health, the environment, science and social solidarity within the framework of social responsibility. However, full compliance with the company's ethical rules and transparency principles is mandatory in these processes. Donations and aid should only be made to organisations that operate for the public benefit and should not provide personal gain. Donation processes should not conflict with the company's commercial interests and should not affect business relationships. The activities of organisations to which donations are made should be examined in detail and checked for any links to money laundering or terrorist financing.

No donation or contribution may be made that is not recorded in the company's records or is not transparent. Direct or indirect donations to political parties, candidates, or public officials are prohibited.

6. Identification and Reporting of Conflicts of Interest

6.1. Duties and Powers of Compliance Officers

Koluman Holding requires employees and managers to promptly report any situation that could give rise to a conflict of interest in order to prevent conflicts of interest and protect fair business relationships.

Employees and managers are obligated to immediately report any situation that could cause a conflict of interest to the Internal Audit, Corporate Risk and Compliance Directorate.

Suspicious transactions and relationships of interest must be reported through a channel that complies with the principle of confidentiality.

All reports are investigated independently and impartially, and employee confidentiality is strictly maintained.

The board of directors is informed of any identified conflicts of interest, and necessary measures are taken to minimize the impact of the conflict on the company.

Koluman Holding emphasizes that its employees and managers are responsible for identifying and reporting conflicts of interest and operates a robust oversight mechanism to ensure the continuity of ethical and transparent business processes.

7. Sanctions and Enforcement

Koluman Holding attaches great importance to preventing conflicts of interest and applies the necessary sanctions when any violation that could cause a conflict of interest is detected.

In this regard:

A disciplinary process is initiated and appropriate sanctions are applied to the employee concerned.

If an inappropriate benefit is found to have been provided in gift, sponsorship, or donation processes,

the relevant business partnership or supplier relationship is terminated.

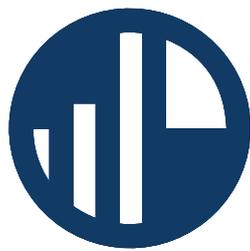
The employment contract of employees who act contrary to the company's ethical rules may be terminated, and the necessary legal processes may be initiated.

In cases where the conflict of interest causes financial or reputational risks to the company, legal sanctions may be imposed on the relevant individuals or organizations.

Koluman Holding resolutely implements its policies aimed at preventing conflicts of interest and adopts a zero-tolerance policy towards unethical behavior.

8. Effectiveness and Updates

Date of First Publication	Revision Date/No.	Explanation
08.04.2025	-	-



Compliance Programme

