



# **KOLUMAN COMPETITION POLICY**



# 1. Purpose and Scope

Koluman Holding supports fair competition in all markets in which it operates and fully complies with competition law. The protection of competition is of great importance for the healthy functioning of the free market economy, the promotion of innovation and the protection of customer interests. This policy has been established to ensure that all employees, managers, affiliates, business partners, suppliers, contractors and distributors of Koluman Holding fully comply with competition law.

Koluman Holding fully complies with national and international competition law, including Law No. 4054 on the Protection of Competition, European Union competition regulations, US competition legislation (Antitrust Laws) and the OECD Competition Policy Guidelines. The company undertakes to avoid practices that distort or restrict competition in all its business processes and to conduct its commercial activities within the framework of ethical rules and legal regulations. This policy sets out preventive measures within the framework of the company's compliance with competition law, provides guidance for employees and managers, and outlines the sanctions to be applied in the event of violations.

## 2. Definitions

The key terms used in this policy are explained below:

**Competition Law:** The set of rules established to ensure that free market conditions operate fairly.

**Competition Authority:** The regulatory authority in Turkey that identifies competition violations and imposes penalties under Law No. 4054 on the Protection of Competition.

**Competitor:** Other companies offering similar goods and services in the markets where Koluman Holding operates.

**Dominant Position:** When a business has the power to significantly restrict competition in a particular market.

**Anti-Competitive Agreements:** Illegal agreements made by companies to fix prices, share customers or markets, restrict supply, or engage in exclusionary practices against competitors.

**Cartel:** Agreements between competing firms to fix prices, restrict supply, or share territories or customers.

**Vertical Agreements:** Contracts between suppliers, dealers or distributors that contain price fixing or competition-restricting conditions.

**Suspicious Transaction:** Commercial transactions or practices that could potentially violate competition law and require investigation by the compliance unit.

**Compliance Programme:** A system of training, monitoring and reporting designed to encourage full compliance with competition law by employees and managers.

## 3. Competition Law Principles and Rules to be Observed

Koluman Holding adopts the following fundamental principles to ensure compliance with competition law in all its commercial activities:

## 3.1. Relations with Competitors

Koluman Holding employees must exercise caution in their communications with representatives of rival companies and act within ethical and legal boundaries. The following points must be observed in meetings with competitors:

- Information regarding pricing, discounts or promotions should not be shared.
- Agreements that restrict competition, such as customer or territory sharing, should not be made.
- Coordination that creates barriers to market entry should be avoided.
- Competitively sensitive information should not be discussed at industry meetings.

## 3.2. Non-Abuse of Dominant Position

Koluman Holding acts in accordance with the principle of protecting fair competition in the areas where it holds a dominant position in the markets in which it operates, and refrains from practices that distort, restrict or prevent competition.

## 3.3. Relations with Dealers, Suppliers and Business Partners

Koluman Holding fully complies with competition law, based on maintaining a fair and competitive environment in its relations with dealers, suppliers and business partners. In this regard:

- Dealers have the right to determine their pricing policies completely independently.
- No regional or customer-based sales restrictions are imposed on dealers and suppliers.
- No contracts are entered into that could undermine the competitive structure of the market or lead to monopolisation.
- The principles of transparency and integrity are observed in public tenders, and collusive behaviour is not tolerated.

# 4. Competition Compliance and Internal Audit Mechanisms

Koluman Holding has developed effective internal control mechanisms to ensure full compliance with competition law and to maintain a fair competitive environment. In this context, various control processes are carried out to raise employee awareness and to identify and prevent anti-competitive practices.

## 4.1. Training and Awareness Activities

All employees and managers receive regular competition law training. Updates are provided on current developments and regulatory changes in the sector. Employee awareness is increased through regular reminders regarding competition compliance procedures.

## 4.2. Detection and Reporting of Suspicious Transactions

Suspicious transactions related to anti-competitive practices are identified and reported to the relevant units. Internal audit processes are strictly implemented to ensure ongoing compliance with competition rules. Where non-compliance is identified, necessary corrective and preventive measures are taken to prevent violations.

## 4.3. Responsibilities of the Internal Audit, Corporate Risk and Compliance Directorate

Conducts internal investigation processes regarding competition violations in an independent and impartial manner. Analyses risky transactions and reports identified violations to the board of directors. Conducts regular audits to enhance the effectiveness of the competition law compliance process. Provides guidance to employees on competition compliance matters.

## 5. Sanctions and Responsibilities

Koluman Holding implements the necessary disciplinary procedures and initiates legal sanctions against employees, managers or business partners who act in violation of competition policy and relevant legal regulations. As non-compliance with competition law may harm the company's ethical values and business continuity, the following measures are taken in such cases:

- Disciplinary proceedings are initiated against employees who do not comply with company policies, and the necessary sanctions are applied.
- Business relationships with business partners, suppliers or dealers found to have violated competition law are terminated immediately.
- Continuous checks are carried out through internal audit mechanisms to prevent violations.
- Necessary preventive measures are taken to prevent the company from being subject to legal sanctions due to activities that violate competition law.
- Managers are responsible for ensuring that competition policies are properly implemented and bear responsibility for violations.
- Koluman Holding expects all employees and business partners to comply with competition rules and has a zero-tolerance policy towards unethical and illegal competition practices.

## 6. Entry into Force and Updates

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



# Compliance Programme

