

COMPETITION POLICY

The purpose of this policy is to demonstrate commitment to the relevant legislation and obligations regarding the preservation of competition, encourage and ensure the awareness and compliance of employees with competition rules, and contribute to the establishment of an effective and fair competitive environment in the countries and sectors in which ERNAMAŞ operates.

ERNAMAŞ cannot be a party to any (formal or informal, written or oral, explicit or implicit) agreement, decision, or merger/acquisition process that aims to prevent, distort, or restrict competition or may have such an effect.

ERNAMAŞ acts with the awareness that full compliance with competition law rules is an integral part of the duties and tasks of all its employees.

ERNAMAŞ avoids any competition-violating practices with competitors and other parties that may be in a competitive position, especially in relation to a specific business, in an unlawful manner, including but not limited to:

- Determining or controlling purchase-sale prices or price elements,
- Giving commitments not to compete,
- Sharing customers, products, or regions,
- Boycotting specific customers, suppliers, or intermediaries,
- Making secret agreements with competitors directly or indirectly in tender processes.

ERNAMAŞ takes necessary precautions not to share competition-sensitive information in any communication with third parties.

In agreements made by ERNAMAŞ with its customers, suppliers, and intermediaries, ERNAMAŞ avoids any practices that may indirectly and/or directly restrict competition and may involve:

- Restricting price-setting freedom,
- Linking the sale of a product or service to the purchase of another product or service,
- Making exclusivity or non-competition agreements,
- Sharing or directing customers, products, or regions

ERNAMAŞ operates with the awareness that it may be in a dominant position in the markets where it operates and refrains from practices that could constitute an abuse of dominant position in these markets, such as:

- Preventing market entry,
- Unreasonably refusing to enter into a business relationship or supply goods without a valid reason,
- Forcing or encouraging customers or suppliers to do business (through loyalty provisions, incentive by discount systems, etc.),
- Tying the sale of certain products/services to the purchase of another product/service,
- Discriminating among the same type of customers or suppliers, setting prices very high or below cost, or making demands for very low purchase prices

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ERNAMAŞ employees carry out their activities in accordance with the Competition Policy

and guidance studies to be prepared by Legal and Compliance Advisors. If employees are

unsure whether they are violating the regulations related to the preservation of competition

in their relationships with competitors, business partners, and customers, they seek the

opinion of Legal and Compliance Advisors.

Legal and Compliance Advisors are responsible for implementing the competition law

compliance program within ERNAMAŞ, monitoring developments in this field, and guiding

company employees when needed.

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