

ÇANAKKALE MOTORWAY AND BRIDGE

**ANTI-BRIBERY,
ANTI-CORRUPTION AND
ANTI-MONEY LAUNDERING
POLICY**



1915 ÇANAKKALE

INTRODUCTION

Responsible and fair business conduct is one of ÇOK A.Ş.'s core values. Accordingly, ÇOK A.Ş. adopts a zero-tolerance policy toward bribery, corruption, and money laundering. The Company is committed to conducting all business relationships and transactions in a fair, honest, and lawful manner, and to establishing, implementing, and maintaining effective systems to prevent any form of misconduct.

In addition, this Policy aims to provide guidance to employees and business partners on preventing and mitigating bribery, corruption, and money laundering risks and reporting suspicious circumstances.

PURPOSE AND SCOPE

ÇOK A.Ş. Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy (Policy) has been prepared within the framework of ÇOK A.Ş.'s Code of Ethical Conduct. This Policy sets out in detail the principles and guidelines regarding anti-bribery, anti-corruption and anti-money laundering and aims to ensure that all business processes and operations of ÇOK A.Ş. are conducted in compliance with the laws of the Republic of Türkiye, the United States Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UK Bribery Act) and, to the extent applicable, the regulations in force in other relevant jurisdictions.

The Policy covers all employees, directors, subsidiaries, and affiliates of ÇOK A.Ş., third parties, and all business partners acting on behalf of or in connection with ÇOK A.Ş. All employees and business partners covered by the Policy are expected to fully comply with the principles and guidelines set out herein.

ÇOK A.Ş. may be held accountable not only for acts of bribery by its employees but also by those acting for or on behalf of ÇOK A.Ş. (Third Parties). So, when using Third Parties for legitimate reasons, it is crucial to make reasonable efforts that such Third Parties apply the same standards as those that ÇOK A.Ş. use itself.

DEFINITIONS

What is Corruption and Bribery?

Corruption is when a person abuses the authority given to him or her to gain any improper benefit for themselves or someone else. Corruption includes a variety of behaviors such as bribery, fraud, embezzlement, conflict of interest, and misappropriation of company assets.

Bribery means offering, giving, promising, accepting, demanding or authorizing anything of value to a person or an organization—either directly or through a third party—with the intent to improperly influence their actions, inactions or decisions to induce them to perform their duties inappropriately, or gain an improper favor, benefit, or advantage.

ÇOK A.Ş. prohibits all forms of bribery regardless of whether it is active (giving) or passive (receiving) or whether it is in the public (involving public officials) or commercial context.

Bribery may take a variety of forms, including:

- Cash and cash equivalents. For example, a payment made in exchange for being awarded a contract, free schooling or an offer of employment.
- Improper gifts, hospitality, entertainment, travel, or unjustified expenses. For example, offering a luxury watch to a public official to obtain a desired permit.
- Facilitation payments: payments made to expedite business. For example, paying a customs officer to expedite customs clearance.
- Inappropriate donations and sponsorships made for personal gain.

In most cases, a commonsense approach is sufficient to recognize whether an action amounts to bribery. However, when in doubt, the following questions may help to guide the answer:

- Am I being asked to pay more than the cost of the service, or am I being asked to provide an unreasonable gift?
- Am I being asked to pay the cost of the service to another person instead of directly to the service provider?

- Is the hospitality, entertainment, or gifts I give or receive reasonable and explainable? Would I feel uncomfortable if I had to disclose them?
- Is a payment or benefit offered intended to induce someone to perform his or her duties improperly, to influence decision-making, or for personal gain?

ÇOK A.Ş. has zero tolerance for all forms of bribery and corruption. Employees of ÇOK A.Ş. are strictly obliged to refrain from any behavior that may give rise to suspicion of bribery or corruption.

Any behavior that may be associated with bribery and corruption will not only be subject to internal disciplinary action but may also lead to serious sanctions that may result in criminal liability.

What is Money Laundering?

Money laundering is the process of making illegally obtained funds appear legitimate by concealing their origin.

The true source of the money or asset — usually a criminal activity — is concealed and funneled into the financial system by giving the appearance of a legitimate transaction. Money laundering is a criminal offense. ÇOK A.Ş. has adopted a zero-tolerance principle against money laundering activities. In this context, business relationships are continuously monitored in line with a risk-based approach. Prior to establishing the relationship and throughout its duration, information regarding the contracting parties, the ultimate beneficial owners, and the purpose of the relationship is obtained, verified for accuracy, updated as necessary upon request, and appropriately recorded.

In principle, cash transactions are avoided, and cash payments may be made in exceptional cases in accordance with cash transaction limits in the legislation, and all financial transactions are transparently documented.

Any suspicious situation must be reported through the channels described in the disclosure section of this Policy.

IMPLEMENTATION OF THE POLICY

ÇOK A.Ş. implements an effective compliance program against bribery, corruption, and money laundering risks. In this context, all business activities and business relations are carried out in accordance with the determined policies, procedures, and legal regulations.

Third Parties and Due Diligence

ÇOK A.Ş. applies appropriate due diligence processes in all business relationships with third parties, including but not limited to business partners, suppliers, consultants, subcontractors, and special representatives. Before the business relationship is established and at necessary intervals during the business relationship, the third party's background, reputation, ownership structure (ultimate beneficiary information), and whether it has any links to illegal activities are examined. In cases of detected non-compliance, the business relationship will not be initiated or the existing relationship will be terminated immediately.

Gifts and Hospitality

ÇOK A.Ş. employees and third parties must not accept, receive or propose any gifts or benefits—whether of monetary value or not—that are directly linked to a return of favor or that may affect, or appear to affect, impartiality, performance, decisions, or behavior of the receiving party in the course of the relevant situation. The principles and guidelines in this regard are set out in detail in the ÇOK A.Ş. Conflict of Interest Policy.

Sponsorships and Donations

ÇOK A.Ş. conducts all sponsorship and donation activities in a transparent, documented, and legitimate manner. Sponsorship and donations at ÇOK A.Ş. are never used as a means of bribery, corruption, or improper influence. Donations are strictly subject to the approval of the SPV Directors.

Facilitation Payments

Facilitation payments—i.e., unofficial payments made to expedite routine official procedures—are not tolerated at ÇOK A.Ş.

ÇOK A.Ş. employees or anyone acting on behalf of ÇOK A.Ş. must not make facilitation payments. Any request for, or suspicion of, a facilitation payment must be reported immediately to the Ethics and Compliance Committee.

Accuracy of Records and Transparency of Transactions

All books and records must be maintained in a complete, accurate, thorough, and timely manner. No transaction may be kept secret or off the record. Accounting records must be verified with supporting documents, and documents must be stored appropriately. The accuracy of accounting records is checked through periodic internal audits.

Any false, or intentionally misleading documentation will be considered a serious breach of this Policy.

Suspicious Transactions

ÇOK A.Ş. ensures that all payment and collection transactions are conducted and properly recorded in compliance with the laws and regulations of the countries in which it operates. ÇOK A.Ş. shall not engage in any activity related to money laundering, terrorism, or the financing of weapons of mass destruction. To this end, it ensures the accuracy of its financial and commercial records in accordance with all applicable national and international legislation. Keeps records of all activities securely and appropriately.

Within this framework, situations such as the suspected use of funds potentially derived from illegal sources, unusual financial movements, transactions with unidentified parties, or payments without a rational commercial justification are considered as “suspicious transactions”. When such transactions are detected, it is obligatory to immediately notify the Ethics and Compliance Committee in writing. In suspicious circumstances, the process is discontinued.

DISCLOSURE

ÇOK A.Ş. values the input of its stakeholders. We have established reporting mechanisms for business partners, managers, and employees that promote open and constructive feedback.

If you suspect any action that may constitute a violation of this Policy or any applicable

national or international legislation, ÇOK A.Ş. encourages you to report the matter through the reporting channels listed below:

Telephone: You may call [0212 800 65 81](tel:02128006581)

E-mail: You can send an e-mail to cok.ethics@speak-hub.com

Disclose Form: You can fill out the disclose form on www.speak-hub.com/cok-ethics

DISCIPLINE

Breach of this Policy may result in serious disciplinary actions, including termination of employment relationship for ÇOK A.Ş.'s employees and executives. If committed by business partners, such violations may lead to the termination of their contracts. Any behavior contrary to this Policy shall be assessed and resolved by the Ethics and Compliance Committee and the SPV Directors, in accordance with applicable local and international laws, as well as the relevant principles and procedures.

DOCUMENT UPDATE, STORAGE AND PUBLICATION

ÇOK A.Ş. ensures that this Policy is the most up-to-date version in force and is shared in publicly accessible resources. This Policy and its previous versions are retained in ÇOK A.Ş. document management systems indefinitely. ÇOK A.Ş. is responsible for ensuring that the current version of this Policy is in force. If this Policy requires an update, the Ethics and Compliance Committee is responsible for conducting the necessary revisions and for ensuring that all parties associated with this Policy are informed accordingly.

This Policy entered into force pursuant to the Board of Directors decision dated 17.09.2025.