

## POLICY FOR PREVENTION AND EFFECTIVE MANAGEMENT OF CONFLICTS OF INTEREST

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### 1. OVERVIEW, PURPOSE AND SCOPE

We, Martur Fompak International, conduct business in an honest and ethical manner in order to prevent and effectively manage any form of conflict of interest, where we operate. The purpose of this policy is to guide the identification, disclosure, and management of conflicts of interest, ensuring that our choices are not in conflict with the best interests of Martur Fompak International. Therefore, we expect all our employees, including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners, such as customers, suppliers, contractors, and consultants, to comply with and act in line with this Policy and to always do business in accordance with our Global Code of Conduct.

### 2. DEFINITIONS

**Conflict of interest** refers to a situation where an individual's personal interests—whether financial, personal, or otherwise—might compromise, or be perceived to compromise, their impartiality and judgment in fulfilling their duties at Martur Fompak International.

**Reputational Damage** refers to any action or situation that can harm our company reputation and create doubt about the fairness, transparency, or reliability of decisions, damaging internal trust among team members and external trust with Business Partners.

**Legal and Regulatory Issues** refer to situations that can lead to fines, penalties, or legal action.

**Productivity and Efficiency Issues** refer to situations that can cause delays, inefficiencies, or poor decision-making if employees are torn between personal interests and professional duties.

**Financial Losses** refer to the potential for poor business decisions, leading to financial loss or missed opportunities.

**Employee Morale Problems** refer to low morale which can lead to a toxic work environment, if unaddressed.

**Actual conflict of interest** refers to a situation where an employee's personal interests directly interfere with their ability to act in the best interests of our company. In this situation, the employee has a real, current interest—whether financial, personal, or otherwise—that could improperly influence their professional actions, decisions, or responsibilities. Such conflicts can damage trust, lead to biased decision-making, and create ethical or legal issues, so we require disclosure of these situations to manage or resolve them.

**Potential or perceived conflict of interest** refers to a situation where the employee may be in a position where their personal interests could influence the fulfilment of their duties in the future even if it is not currently influencing their decisions or actions. All employees should avoid from actions that may be perceived as conflicts of interest by Business Partners as such actions could harm our reputation, and this perception can create doubts about the fairness and transparency of the employee's decisions, even if the personal relationship doesn't actually influence their work. We require employees to disclose potential conflicts of interest to address or prevent them before they become actual conflicts.

### 3. EXAMPLES OF CONFLICTS OF INTEREST

The following examples, which include but not limited to the listed below, demonstrate how conflicts of interest can occur in various forms, potentially impacting the fairness and effectiveness of business decisions.

- **Providing and/or Accepting Benefits in Business Decisions:** Offering and/or receiving advantages to themselves or third parties in transactions, contracts, or negotiations.
- **Favoritism Towards Affiliated Organizations:** Benefiting institutions, organizations, or NGOs where the employee has a partnership, employment, representation, or membership role.
- **Supplier Relationships:** Making purchasing decisions influenced by personal relationships (such as family members or friends) with suppliers or service providers.
- **Contracts with Relatives' Businesses:** Gaining benefits by contracting with suppliers or contractors in which relatives have ownership or partnerships.
- **Competing Side Businesses:** Operating a side business that directly competes with Martur Fompak International.
- **Holding External Positions:** The employee may engage in secondary employment, provided it does not compromise the fulfillment of their contractual duties or conflict with the Company's legal, contractual, or policy interests. Any such activity must be disclosed to the employer in writing in advance and is not permitted if it involves the automotive sector, a direct competitor, or any activity that may compete with the Company.
- **Misuse of Company Resources:** Utilizing company resources (physical, digital, financial, non-financial, or trade secrets) for personal or third-party benefit, or political activities.
- **Violation of Gifts and Hospitality Rules:** Breaching company guidelines on gift acceptance and hospitality limits to gain material or non-material benefits, accepting substantial gifts or event invitations from customers or suppliers, creating an appearance of bias.
- **Financial Relationships with Coworkers:** Lending, borrowing money, or financial arrangements with coworkers, especially those in subordinate-superior relationships, which could affect workplace harmony.

- **External Financial Ties with Suppliers/Contractors:** Forming personal financial relationships (loans, debts) with Business Partners such as suppliers, contractors, or consultants.
- **Portfolio Management for Others:** Managing financial portfolios of company employees.
- **Employee Business Partnerships:** Establishing or actively participating in business partnerships or companies with colleagues.
- **Investment Interests in Competing Firms:** Holding and/or investing shares in competing companies, which could bias strategic company decisions.
- **Unauthorized Fundraising or Donations:** Collecting money or donations from employees and/or Business Partners for personal or external causes without permission from the Legal and Compliance Team
- **Personal Relationships in Hiring:** Hiring friends or relatives without a transparent process, potentially leading to favoritism.
- **Influence on Employment Decisions Involving Relatives:** Having authority in decisions about hiring, discipline, promotion, or termination involving relatives.
- **Consulting for Competitors:** Providing consulting services to competitors, risking the disclosure of sensitive information.
- **Disclosure of Confidential Information:** Sharing confidential information, intentionally or inadvertently, with individuals outside the company.
- **Board Memberships with Conflicting Interests:** Serving on boards of other companies which are commercially active in the same or similar field of business with Martur Fompok International, which could compromise objectivity.

The examples of conflicts of interest mentioned above are common, but other situations may also create a conflict of interest. Any circumstance that prevents you from giving your best effort to our company or compromises your loyalty to Martur Fompok International could potentially constitute a conflict of interest and must be disclosed.

#### 4. CONFLICTS OF INTEREST DISCLOSURE PROCESS

It is important to clarify that having a conflict of interest is not inherently misconduct – however, how we address it can be. It is all about transparency. Proactively declaring such situations is crucial for upholding trust and integrity.

Anyone who finds themselves in an actual or potential conflict of interest situation must disclose this situation through “Ask a question” button on our Ethics Hotline web page, to enable the assessment and management of any potential or actual risks.

- EthicsPoint - Martur Fompok

(<https://secure.ethicspoint.eu/domain/media/en/gui/113746/index.html>)

A disclosure should include the employee’s name, surname, location, department, and position, with a detailed description of the situation including the names of other parties involved. If a declaration made through the link above does not include the information above, it will not be deemed as a “Conflict of Interest Declaration” and will not be answered.

Why do we require personal information in Conflicts of Interest disclosures?

- Knowing the employee’s role, department, and location helps determine the extent of the conflict.
- Allow the Legal and Compliance Team to assess potential impact on company operations.
- Identifying the person allows for fair and thorough evaluation.
- Prevents misuse of anonymous reporting for personal grievances or false allegations.
- After the Legal and Compliance Team review the disclosure, the employees may be asked for additional details or required to take mitigating steps (e.g., recusing themselves from a decision-making process, reassigning duties...)

The Legal and Compliance Team will review the situation in collaboration with the employee’s manager, HR Department, Legal Department if needed, and communicate the results to the person concerned. The employee must subsequently follow the guidance provided by the Legal and Compliance Team.

If you are unsure whether your situation qualifies as a conflict of interest, please seek guidance through the Ethics Hotline.

#### 5. AUTHORITY AND RESPONSIBILITIES

All our employees, including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners who experience or witness any conduct they believe to be in conflict with this Policy, should report with assurance of confidentiality and protection from retaliation as outlined in our Whistleblowing Policy. In addition, they are also expected to align with and actively support these principles by promoting a Workplace where everyone is valued and treated with dignity and respect.

#### 6. VIOLATIONS AND CONSEQUENCES

By this Policy, we actively prevent and prohibit such aforementioned or similar conduct. Our zero-tolerance principle means; if such a conduct does occur, we will look into and review every allegation of violation, take appropriate action in order to maintain well-being at work which is a prerequisite. If there is a discrepancy between the local regulations, applicable in the countries where our company operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersedes. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by Business Partners or any third parties, their contracts may be terminated. This Policy will be periodically reviewed by the Legal and Compliance Team to ensure compliance with new or revised laws and regulations.