



Doc Title	Alt_Tr_Std_Ext_Comp_Altium Türkiye Business Ethics and Standards of Conduct
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## 1 Business Ethics

Altium International Laboratuvar Cihazları A.Ş. (from now on referred to as Altium Türkiye) is committed to doing business by the highest standards of business conduct and ethics, and we consider our reputation for ethical and compliant behavior a valuable corporate asset. This procedure;

- *Serves the purpose of regulating business conduct within areas of marketing, promotion and sales in Turkey.*
- *Cannot substitute Turkish law that must be followed at all times. However, when this procedure sets a higher standard, it should be followed.*
- *The purpose of the procedure is to give directions to all employees in order to protect the company from the consequences of malpractice.*

## 2 Scope

The document is applicable to all Altium Türkiye employees. When Altium Türkiye employees work with external partners, this document is also applicable to them.

## 3 Introduction

The increasingly complex business environment makes choices about how to behave in the marketplace more challenging. It is vital that each employee realizes how their business decisions impact Altium Türkiye. Bribery, in whatever form, is illegal and so carries immediate substantial financial and reputation risks as well as risk for criminal charges, but it also undermines our business integrity and impacts our long-term business success because of that.

## 4 Roles and Responsibilities

### 4.1 All employees

- *Comply with the SOP and requirements within Business Ethics.*
- *It is expected that employees report incidences of malpractices to their manager, to their manager's manager or the compliance department.*

## 4.2 Managers

- *Communicate the relevant parts of the procedure and ensure that they are understood by all the relevant employees.*
- *Promote Business Ethics in all relevant forums, take leadership and show a good example for others.*
- *Clearly communicate the guidance provided in this document to external parties working on behalf of Altium Türkiye within each unit and ensure that relevant external parties also comply with this procedure.*
- *Approve not only the expense according to this guideline but also the quality of the supporting documentation.*

## 4.3 Finance Employees

- *Process and record the approved invoices and expense reports into system used.*
- *Review the supporting documentation for approved expenses on a sample basis and to reject invoices and expense reports that are not in accordance with the requirements described in this procedure.*

# 5 Conduct & Customer Relationship Management

## 5.1 Educational Materials

Only the items stated below are accepted:

- *Printed materials that are in line with fair market value such as books, booklets, journals,*
- *Brochures and advertisements, providing sufficient and necessary information regarding the product;*
- *Audio-visual materials presented in storage media such as flash disks and CDs/DVDs distributed for educational or training objective that are in line with fair market value;*
- *Audio-visual materials such as films, slides, video shoots, databanks and electronic media including the internet that are in line with fair market value;*
- *Any type of publications and materials in line with fair market value that may be used as a source of information/data/reference by relevant circles;*
- *Pens and notepads to the participants of the meetings that Altium Türkiye arranges and are all in line with modest monetary value (verify the compliance with the expense policy's approved limits).*
- *These items cannot carry product logo but company name or logo may appear.*

The employees cannot offer or provide any benefit in kind or in cash (e.g. fridge, free goods, commission, etc.) to any customers. This is applicable for payments even on the employees' own behalf and on their own account.



## 5.2 Social Courtesy

No gift or pecuniary advantage (in cash or benefit in kind) or any material which could be perceived as such or possessing the qualities of gift, will be supplied, offered or promised to a customer.

Flower/sweets can be presented only for social courtesy reasons at the occasions stated below (verify the compliance with the expense policy's approved limits):

- *Academic success*
- *Opening of a new lab*
- *Holidays and special days*
- *Job promotion (assignment to another place with the same title is not included)*
- *New Year*

## 5.3 Other Issues related to General Conduct

The information transmitted to customers about all the products must be up-to- date information supplied by the provider.

Except as required by law, sales of any product cannot be related with the condition of providing any other product.

Whenever a product is supplied, customers must be informed against any kind of risks rooted in the related product.

## 5.4 Conduct related to Competitors

Altium Türkiye employees must avoid any offensive or unsupported statements against competitors and their products.

Comparison of competitor products as to quality, technical aspects and value must be conducted depending only on published, factual and up-to-date information.

If any information about competitors, competitor products etc. is obtained by customers who have a nondisclosure agreement or who doesn't have a written approval, it is strictly forbidden to share this information with third parties (all the suppliers included).

# 6 Donations

## 6.1 Donations

Community support is be encouraged as part of a corporate social responsibility; however, managers and employees must be careful to ensure that donations are not used as a subterfuge for and do not constitute bribery.

### 6.1.1 A donation is a support tool:



- *A donation is a suitable assistance offered to a institution for the benefit of its operations.*
- *It is not acceptable to make donations to individuals.*
- *A donation is never a tool to induce sales, but a support to the Turkish education system.*

#### 6.1.2 Donations for use in educational practices:

- *The donated items should exclusively be suited for use in educational practice. Also, the donation items should intend to cover the gaps of insufficient funding of social education.*
- *Anything not fitting the criteria for educational items mentioned above is a donation and should be treated as such.*
- *Donations of laboratory kits and supplies can be made to support education within the framework of Altium Türkiye's social responsibility.*
- *Any donation of laboratory kits or similar items will be made directly to the principal investigator.*
- *Donations are allowed depending on the legal requirements and the acceptable price limit of the line item.*

#### 6.2 Rules for donations:

Donations can only be offered to state-owned institutions and organizations and non-profit organizations, associations, foundations and institutions and their related status must be approved by the related ministry or competent authorities.

It is permitted to donate cash or cash-equivalent benefits to nonfor-profit organizations, associations, foundations and institutions and state universities provided the proposed donation is reviewed and approved for public benefit, specific and not exclusively related to any Altium Türkiye products.

The receiving non-profit organizations, associations, foundations and institutions have to issue the appropriate confirmation of receipt.

For non-profit organizations, associations, foundations and institutions, written agreement for non-for-profit institutions must be submitted to the Finance Department along with the expense report or payment request.

For cash donations to non-profit organizations, associations, foundations and institutions and state universities, a cash receipt note must be obtained and the amount of the donation must be written within the written agreement.

All direct or indirect donations made to non-profit organizations, associations, foundations and institutions and public healthcare institutions or organizations shall be documented

The records and documents with respect to donations will be maintained for a minimum of 5 years unless a shorter period is required under applicable legislation.



### 6.3 Approval of Donations

The information about the donation (where it is to be made, the amount of the donation, the purpose of donation) must be approved by the general manager. The related department manager is responsible for ensuring the compliance of the donation with this procedure and Turkish law and the monitoring of the accurate documentation process.

### 6.4 Donation of Scientific Support Items

Scientific support items that are for sharing information or education and have a scientific purpose as mentioned below (For example but not limited to) are subject to donation procedure;

- *Poster preparation/print*
- *Technical translation*
- *Educational Items*
- *Generally accessible practice (method) and/or information sharing*

### 6.5 Communication

In case of any doubts, contact your Department Manager or Compliance Team (by [compliance.tr@altium.net](mailto:compliance.tr@altium.net)) before offering your present or making donations to ensure compliance.

## 7 Sponsorships

Sponsorship means any commercial agreement by which a sponsor, for the mutual benefit of the sponsor and sponsored party, contractually provides financing or other support in order to establish an association between the sponsor's image, brands or products and a sponsorship property, in return for rights to promote this association and/or for the granting of certain agreed direct or indirect benefits.

Altium Türkiye may provide sponsorships for scientific purposes, education programmes or investigator initiated research proposals.

However, employees must ensure that these are not used to influence the recipient unduly and are not seen as bribery. The Bona Fide nature of the sponsorship must be documented in a written agreement.

Any request of sponsorship is subject to written approval from the finance director or General Manager regardless of monetary amount. All demands on sponsorship are subject to the approval of the general manager regardless of the price.

## 8 Hospitality

When interacting with third parties in Turkey, Altium Türkiye employees are expected to comply with the limit, which is defined clearly in Altium Türkiye Expenditure Policy. Line managers are responsible for minimizing, controlling and approving exceptions. If any thresholds are exceeded, an explanation should be included in the expense report. As per interactions outside of Turkey, the restrictions imposed in the host country should be compared and the most restrictive one should be followed.

## 9 Meetings with Customers

Altium Türkiye must not provide hospitality to customers except in association with scientific events, promotion events, scientific congresses and other such events.

Altium Türkiye may appropriately sponsor a wide range of meetings. These meetings range from small lunchtime audio-visual presentations in a practice, lab meetings and meetings at post-graduate education centers, launch meetings for new products, management training courses, meetings of investigators in lab tests, satellite symposia through a large international or national meetings/congresses organized by independent bodies.

With any meeting, certain basic principles apply:

- *The meeting must have a clear scientific content;*
- *The hospitality associated with the meeting must be secondary to the nature of the meeting; must be appropriate and not out of proportion to the occasion;*
- *Hospitality activities sponsored by Altium Türkiye must be limited to registration fee, reasonable accommodation, transportation and meal costs;*
- *Hospitality will be paid to the organization company of the meetings and not directly to the participants;*
- *Any hospitality provided must not extend to a spouse or other such person unless that person is also a member of the health professions or appropriate administrative staff and qualifies as a proper delegate or participant at the meeting in their own right.*

Altium Türkiye will provide the sponsorships to meetings under the conditions below;

- *The meeting must be related to the area of specialty/role of the participants professional;*
- *A customer may benefit from participation sponsorship for maximum two times and only one of them may be for meetings held abroad.*

Meetings organized for customers which are solely or mainly of a social or sportive nature (such as sporting event tickets, theater tickets, leisure trips) are unacceptable.

Any promotional scientific activity paid by Altium Türkiye has to:

- *Have participation by a Altium Türkiye employee.*
- *Include a presentation of scientific nature*
- *The primary focus of the activity has to be scientific.*

As a general rule, the expenses must not exceed what professionals would normally be prepared to pay for themselves.

Company policy strictly prohibits any payment (e.g. commission or bonus) or providing anything of value (e.g. refrigerators, printers, etc.) to customers on the name or account of employees' themselves (i.e. even if the costs are to be borne/reimbursed by employee)



## 10 Free Samples

Free Samples of a products may be supplied to customers in order to familiarize customers with the product.

It is not allowed to resell Samples or otherwise misuse them.

Each free sample may be distributed up to 5% of total sales.

The total amount of free samples of a product to be distributed cannot exceed 4 samples per prescriber.

The delivery of free samples to the client should be documented, and a signed delivery receipt must be obtained from the customer.