



09 June 2026

Abidin Sertaç ÖZMANSUR, Founder & Owner

## THE SHOWGATE FUARCILIK VE ORGANIZASYON A.S.

### Anti-Bribery and Anti-Corruption Policy

#### 1. Purpose

The Showgate is committed to conducting all business with the highest standards of integrity and ethics. We strictly prohibit bribery and corruption in any form.

This policy ensures compliance with Turkish law, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, and all applicable anti-corruption laws in the countries where we operate.

Our goal is to protect our reputation, our employees, our partners, and our clients while supporting Turkish companies' success in international exhibitions.

#### 2. Scope

This policy applies to:

- All employees, managers, and owners
- Agents, consultants, representatives, and third parties acting on behalf of The Showgate
- All business activities, including exhibition stand sales, consulting services, event organization, and partnerships

#### 3. Zero Tolerance Statement

**Bribery and corruption are strictly prohibited.**

No employee or representative may offer, give, request, accept, or promise anything of value to improperly influence a decision or gain a business advantage.

#### 4. What is Prohibited

- **Bribery:** Offering or giving money, gifts, hospitality, favors, or anything of value to government officials, private clients, or decision-makers to obtain or retain business.
- **Facilitation payments:** Small unofficial payments to speed up routine government actions (e.g., customs clearance, visas, permits) — these are also prohibited.
- **Kickbacks and secret commissions.**



- **Improper gifts & hospitality:** Gifts or entertainment that could influence decisions. Modest, occasional gifts are allowed only if they meet all these conditions:

- Transparent and properly recorded
- Not cash or cash equivalents
- Reasonable value (maximum 200 USD / equivalent per occasion)
- Approved in advance by the Owner if over 100 USD

- **Political contributions using company funds or resources.**

## 5. Red Flags (Warning Signs)

Be especially careful if you see:

- Requests for payments to offshore accounts
- Unusual discounts or commissions
- Pressure to act quickly without proper documentation
- Gifts during tender or approval processes
- Use of intermediaries without clear need

If you see a red flag, stop and consult the Owner immediately.

## 6. Due Diligence & Third Parties

Before working with any agent, consultant, or partner:

- Conduct basic background checks
- Include anti-bribery clauses in contracts
- Require them to confirm they follow similar standards

## 7. Reporting Concerns

- You must report any suspected violation immediately.
- Reports can be made to the Owner (confidentially).
- No retaliation will be tolerated against anyone who reports in good faith.

## 8. Record Keeping

All gifts, hospitality, payments, and contracts must be accurately recorded in company books. False or misleading records are prohibited.



## 9. Training & Communication

- All employees will receive a copy of this policy and training upon joining and annually.
- The policy will be reviewed every year or when laws change.

## 10. Consequences of Violation

Any breach of this policy will result in disciplinary action, up to and including immediate termination of employment or contract.

Legal action and reporting to authorities may also occur.

## 11. Owner's Commitment

As the owner of The Showgate, I personally commit to full compliance with this policy and expect every member of our team to do the same.

Signed by:

**THE SHOWGATE FUARCILIK VE ORGANIZASYON A.S.**

Sign/Stamp: \_\_\_\_\_

Name: **A. Sertaç ÖZMANSUR**

Title: **Founder**

(duly authorised under the laws of country for and on behalf of The Showgate Fuarcilik ve Organizasyon A.S.)

Date: \_\_\_\_\_

Print Name: **ABİDİN SERTAÇ ÖZMANSUR**