

Anti-Bribery and Corruption Policy 反贿赂和反腐败政策

1. Purpose and Scope 目的和范围

The purpose of Anti-Bribery and Corruption Policy (“Policy”) of ETKO (Ecological Farming Control Organization) is to ensure compliance of employees with the then-current legal regulations against bribery and corruption in all countries where ETKO operates as well as to the ethical principles and other international standards. As ETKO we take a zero-tolerance approach to bribery and corruption.

ETKO 的反贿赂和反腐败政策（“政策”）的目的是确保员工在 ETKO 运营的所有国家和地区中遵守现行的反贿赂和腐败法律法规，道德原则和其他国际标准。作为 ETKO，我们对贿赂和腐败采取零容忍的态度。

Anti-Bribery and Corruption Policy of ETKO applies to;

- All employees including the Board of Directors,
- All subsidiaries and affiliates of ETKO and their employees,
- ETKO’s outsourcing companies and their business partners and employees.

ETKO 的反贿赂和腐败政策适用于：

- 所有员工，包括董事会，
- ETKO 的所有子公司和分支机构及其员工，
- ETKO 的外包公司及其业务合作伙伴和员工。

The Policy is an integral part of the: Principles, Ethical Principles, Personnel Regulations, Collective Labor Agreement, Trading and Tendering Regulations and legislation and legal regulations.

该政策是下述要素不可分割的部分：原则、道德法则、人事条例、集体劳动协议、贸易和招标条例以及法律法规。

2. Definitions 定义

Corruption is demanding, offering, giving or accepting any kinds of bribe or illegal benefits that would cause deviations in the lawful performance of duties or necessary actions by a person who directly or indirectly acquires the illegal benefit or bribe.

腐败是明确要求、提供、给予或接受任何形式的贿赂或非法利益，而这将导致直接或间接获得非法利益或贿赂的人员在履行法定职责或采取必要行动时发生偏差。

Bribery is a person’s gaining benefit within the framework of an agreement entered into with a third party so that such person acts in breach of the requirements of his/her duty by performing or not performing a work, speeding up or slowing down thereof, etc.

贿赂是在与第三方达成的协议框架内获得的利益，因此该人通过执行或不执行工作，加快或减慢工作速度等行为来违反其职责要求。

Bribery and corruption may occur in various different ways. To the person, family, relatives and/or other third parties, these may include:

- Cash Payment
- Gifts
- Political and Other Donations
- Hospitality
- Illegal and non-contract commissions,
- Illegal and non-contract social interests
- Facilitation Payments

贿赂和腐败可能以各种不同的方式发生。对于个人，家庭，亲戚和/或其他第三方，这些行动可能包括：

- 现金支付
- 礼物
- 政治及其他捐款
- 款待

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- 非法和非合同佣金，
- 非法和非契约的社会利益
- 便利费

3. Duties and Responsibilities 职责和权限

The Anti-Bribery and Corruption Policy has been approved by the Board of Directors. The implementation and updating of the Policy shall be ensured through assignments made by the Board of Directors.
董事会已批准了《反贿赂和腐败政策》。该政策的实施和更新应通过董事会的指派来确保。

Within the scope of the Anti-Bribery and Corruption Policy, the processes, systems and organizational structures required complying with the legal regulations and ethical principles have been established and related duties and responsibilities have been written down. Accordingly;
在《反贿赂和腐败政策》的范围内，建立了符合法律法规和道德原则所需的流程、系统和组织结构，并写下了相关的职责和责任。因此：

- Regulating and amending the ethical principles is under the authority of ETKO Board of Directors and disciplinary sanction is implemented in case of violation of these principles by an employee. Board of Directors is authorized to examine such cases.

道德原则的规范和修改是在 ETKO 董事会的授权下进行的，如果员工违反了道德原则，则将受到纪律处分。董事会有权审查此类情况。

- As a result of the internal audits performed, all kinds of information regarding the violations issues are reported to the Board of Directors. The Board of Directors evaluates the reports and makes a decision.

作为执行内部审核的结果，所有有关违规问题的各种信息均会报告给董事会。董事会对报告进行评估并做出决定。

- As a result of the independent evaluation, it shall notify the relevant units for the development of the policy. 作为独立评估的结果，其将通知到有关部门以制定更符合的政策

- The managers of all departments of ETKO are responsible from taking measures within the scope of their duties for assessing the potential risks and to ensure the compliance of employees, outsourcing companies and business partners with the Policy principles.

ETKO 各部门的经理有责任在其职责范围内采取措施，以评估潜在风险并确保员工，外包公司和业务合作伙伴遵守政策原则。

- ETKO's employees are responsible from adhering to the policies determined by the top management, to carry out their duties determined by the legislations and relevant regulations within their authorities and from working in compliance.

ETKO 的员工有责任遵守最高管理层制定的政策，在其职权范围内履行法律和相关法规确定的职责，并有责任遵守法规。

4. Bribery and Corruption 贿赂和腐败

ETKO is against all kinds of bribery and corruption and also is determined to comply with the relevant laws, regulations and principles. Receiving bribes or bribing can never be accepted regardless of its purpose.

It is essential that the business relationships shall not be continued with third parties (outsourcing companies and business partners) who wish to get service from ETKO via bribery.

ETKO 反对各种贿赂和腐败行为，并决心遵守有关法律、法规和原则。无论收受贿赂或贿赂的目的是什么，都永远不会被接受。必要的是，不得与希望通过贿赂从 ETKO 获得服务的第三方（外包公司和业务合作伙伴）保持业务关系。

5. Major Risk Areas of Corruption 腐败的主要风险领域

In ETKO, in order to ensure efficient fight against bribery and corruption, possible risks are identified beforehand by related units, services and operations are separated into categories and necessary analyses are carried out. According to the results of the analysis studies and within a risk-based approach, necessary measures are taken by considering

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the possible risks. The measures taken at this stage are determined taking into account the risk-exposure level of the positions of the existing employees and their level of access within their roles.

在 ETKO 中，为了确保有效打击贿赂和腐败，相关单位事先确定了可能的风险，将服务和运营划分为几类，并进行了必要的分析。根据分析研究的结果，并在基于风险的方法内，通过考虑可能的风险来采取必要的措施。确定现阶段所采取的措施时要考虑到现有员工职位的风险暴露水平及在其职责范围内的接触程度

a) Gifts 礼物

A gift is a product generally given by customers or persons being in a business relationship with ETKO as a means of appreciation or commercial courtesy and which does not require a financial payment.

All kinds of gifts given to third parties by ETKO are offered publicly and with goodwill. The same principles are applied for accepting a gift and under no circumstances may a gift is accepted unless it is a low priced symbolic one given not to the person but his/her company in accordance with these principles. 礼物是通常由与 ETKO 有业务关系的客户或个人提供的一种产品，作为一种欣赏或商业礼貌的方式，不需要支付财务费用。ETKO 向第三方提供的各种礼物都是公开和善意提供的。接受礼物应遵循相同的原则，并且在任何情况下都不能接受礼物，除非礼物是按照这些原则不是给个人而是给他/她的公司的低价象征性礼物

Even if it complies with the Policy, no gift must be offered or accepted in situations which could cause any conflict of interest or perceived as such. 即使符合政策规定，也不得在可能引起利益冲突或被视为利益冲突的情况下提供或接受礼物

b) Political Donations 政治捐赠

It is essential that ETKO does not make any corporate or individual payment, give any gift, and provide financial aid or donation to any government official or political party candidate in order to influence any decision at the service procurement or rendering stage likely to be related to the continuity of ETKO operations or for the benefit of ETKO. ETKO 至关重要，我们不向任何政府官员或政党候选人支付任何公司或个人款项，给予任何礼物以及提供财务援助或捐赠，确保不影响其在服务采购或提供阶段可能与之相关的任何决定，例如 ETKO 业务的连续性或其它 ETKO 的利益。

c) Hospitality 款待

Hospitality may be offered to third parties for developing commercial relationships and for establishing a normal commercial communication network. Among such third parties, customers, consultants, lawyers, auditors and other companies who have business relationship with ETKO can be mentioned. Hospitality offered by ETKO shall be publicly, unconditionally and with good will. 可以将款待可以是提供给第三方以建立商业关系及建立正常的商业交流网络。在这些第三方中，可以提及与 ETKO 有业务关系的客户、顾问、律师、审计师和其他公司。ETKO 提供的招待应公开、无条件并具有良好意愿。

Even if it complies with the Policy, hospitality must not be offered or accepted in situations which could cause any conflict of interest or perceived as such. 即使符合政策，也不得在可能引起利益冲突或被视为利益冲突的情况下提供或接受款待。

d) Outsourcing Companies and Business Partners 外包公司和业务合作伙伴

Outsourcing companies and business partners including those from which support services are obtained must comply with the principles of the Policy and other relevant regulations. For this reason, in all agreements and contracts with the outsourcing companies and business partners, the requirement of compliance with ETKO's policies and understanding and implementing of these issues by the company's and its business partners' employees is included. With these principles, potential risks are eliminated. ETKO terminates its relations with the persons or institutions failing to comply with the Anti-Bribery and Corruption Policy.

外包公司和商业伙伴，包括那些从中获得支持服务的公司和商业伙伴，必须遵守本政策的原则和其他相关规定。因此，在与外包公司和业务合作伙伴的所有协议和合同中，都要求遵守 ETKO 的政策以及公司及其业务合作伙伴的员工理解和实施这些问题的要求。利用这些原则，消除了潜在的风险。ETKO 终止与不遵守反贿赂和腐败政策的个人或机构的关系。

Under no circumstances ETKO works with any company or its business partners having a negative intelligence and which is included in a monitoring list in this field. Due diligence is conducted beforehand. In the selection of outsourcing companies and their business partners, besides usual technical criteria, having a positive background

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and policies equivalent to ETKO's policies and ethical principles are paid regard to. In addition, it is verified if the payments are appropriate and legitimate for the purchased service.

ETKO 在任何情况下都不会与任何具有负面情报的公司或其业务合作伙伴合作，这些公司或商业伙伴都包含在此字段的监视列表中。事先会进行尽职调查。在选择外包公司及其业务合作伙伴时，除了通常的技术标准外，还要考虑具有与 ETKO 的政策和道德原则相当的积极背景和政策。此外，还会验证付款是否对所购买的服务合适且合法。

All related units involved in the purchase of an outsourced service are subjected to ETKO's internal audit and compliance with the abovementioned principles is evaluated during audits.

购买外包服务所涉及的所有相关部门均需接受 ETKO 的内部审核，并在审核过程中评估是否遵守上述原则。

e) Facilitation Payments 便利费

ETKO does not allow the persons and institutions within the context of this Policy to offer facilitation payments in order to guarantee or accelerate a routine transaction or process with government agencies. ETKO 不允许本政策范围内的个人和机构提供疏通费，以保证或加速与政府机构的日常交易或程序。

6. Correct Recordkeeping 正确记录保留

The principles about the accounting and recordkeeping system which must be complied with by ETKO are laid down within the legal regulations and ethical principles. In this context, all kinds of accounts, invoices or other documents related to dealings with third parties (customers, suppliers, etc.) should be recorded and kept completely, accurately and reliably. Any falsification of commercial or similar records and any false representation should be avoided.

法律法规和道德原则中规定了 ETKO 必须遵守的有关会计和记录保存系统的原则。在这种情况下，应记录和与第三方（客户，供应商等）交易有关的各种账目，发票或其他文件，并应完全，准确和可靠地保存。商业或类似记录的任何伪造和任何虚假陈述均应避免。

Certificates may only be issued by authorized persons from ETKO. Documents issued by persons who are not authorized to issue certificates are fake/misleading documents. 证书只能由 ETKO 的授权人员签发。由未获授权签发证书的人士签发的文件属虚假/误导文件。

Fake documents are documents prepared in a way that is contrary to the form and content determined by the standards, and prepared as if there were a real transaction or situation, even though it did not exist. 虚假文件是指以与标准所确定的形式和内容相违背的方式编制的；本身不存在，却假装存在真实交易或情况。

A fake document is a document that shows the existence of a transaction that does not actually exist. 假文档是一种将实际不存在的业务虚假显示为存在的文档。

All kinds of documents and receipts with fake signatures and amounts, and documents intended to be used for current year transactions even though they are related to previous years are examples of fake documents. 伪造签名和金额的各种文件和收据，以及与往年有关却打算用于当年交易的文件，都属于伪造文件

A misleading document is a document that, although based on a real transaction or situation, reflects this transaction or situation untruthfully in terms of nature or amount, reflects the transaction in a different way than the original, and is prepared in a way that does not reflect the real legal situation. 误导性文件是指虽然基于真实的交易或情况，但在性质或金额上不真实地反映该交易或情况，以与原始不同的方式反映该交易，并且以不反映真实情况的方式编制的文件。

Documents that show less or more value of the goods or services than the real value, or whose buyer, seller, date, and serial number are falsified, are considered misleading documents. 显示货物或服务的价值低于或高于实际价值的文件，或其买方、卖方、日期和序列号是伪造的文件，被视为误导性文件。

Actions required by the standard regarding fake/misleading documents are taken. 将会采取标准要求的针对虚假/误导性文件的行动。

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7. Training 培训

The Anti-Bribery and Corruption Policy has been communicated with all employees and is always and easily accessible within the intranet environment.

For the purpose of ensuring that employees adopt the principles of the Policy and works in compliance with these principles, continuous trainings are delivered considering legal obligations and regulations.

《反贿赂和腐败政策》已经与所有员工进行了沟通，并且在内部网络环境中始终可以轻松访问。

为了确保员工采用本政策的原则并按照这些原则开展工作，在考虑法律义务和法规的情况下进行了持续培训

8. Reporting the Cases and Conducts Contrary to the Policy 报告与违反政策的案件和行为

ETKO employees and the persons acting on behalf of ETKO are obliged to promptly and directly report to the Board of Directors any person or institute acting contrary to the rules of this Policy or any case in violation of the rules. The notifications are kept strictly confidential. During inspections and investigations after the notification, the rules of confidentiality are observed with great care and avoidance of harm to the notifying employee is taken as a priority.

ETKO 员工和代表 ETKO 的人员有义务立即直接向董事会报告任何违反本政策规则或违反规则的人员或机构。通知将严格保密。在通知后的检查和调查过程中，应严格遵守保密规则，并优先考虑避免对通知雇员的伤害

Any ETKO employee can use in case of his/her observation that co-worker breached this policy, Board of Directors could be informed anonymously by a letter of information.

任何 ETKO 员工应该在观察到其的同事违反此政策时，可以以通过一封信息通知信匿名通知董事会。

9. Supporting and Protecting the Employees Who Comply with the Policy 支持和保护遵守政策的员工

ETKO promises to the employees who comply with the rules related to the prevention of bribery and corruption that there will be no retaliation against them because of acting in accordance with that rules, that it will protect the employees who acts in accordance with the policies in any circumstances and that relevant notifications to Board of Directors shall be kept confidential.

ETKO 承诺遵守与防止贿赂和腐败有关的规则的员工将不会因遵守该规则而对其进行报复，我们在任何情况下都将保护按照政策行事的员工，并且向董事会的相关作通知所有的通知人的信息应该被保密。

10. Sanction 制裁

Any violation of Anti-Bribery and Corruption Policy may lead to disciplinary action, which could result in termination of contract. The cases violating this Policy are inspected by Board of Directors and if any conduct not complying with the legislation is determined, necessary sanctions are applied in accordance with the legislation. Furthermore, those who do not comply with the legislation are liable to possible criminal sanctions.

何违反反贿赂和腐败政策的行为都可能导致纪律处分，从而可能导致合同终止。违反本政策的案件将由董事会进行检查，如果发现任何不符合法规的行为，则将根据法规实施必要的制裁。此外，不遵守法律的人可能会受到法律制裁。

11. Additional Terms specific for Textile Exchange program / Textile Exchange 项目特定附加条款

When performing certification activities for Textile Exchange standard(s), the additional terms as specified in the "GP 31 Anti-Bribery and Corruption Policy -Annex Additional Terms specific for Textile Exchange program " shall be signed and complied.

在对 Textile Exchange 标准进行认证活动时，应签署并遵守《GP 31 反贿赂与反腐败政策 - 附录：Textile Exchange 项目特定附加条款》中规定的附加条款。

Note for ETKO Employee 给 ETKO 员工的说明:	I read& understood the procedure, accept to comply it and take one copy of it.
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	<p>One copy of this document is kept with my personnel File. 我已阅读并理解该程序，接受并遵循该政策且保留该政策的副本。我的人事档案中也保留了该文档的一份副本。</p>
<p>Name of Personnel & Signature 员工的名字和签名</p>	<p>Date signed 签署日期</p>
<p>Note for ETKO Client: One copy of this document will be signed by each firm at the beginning of the audit process and put in the audit file as a part of audit documents. 给 ETKO 客户的注释：在审计过程开始时，每家公司都会签署一份该文件的副本，并将其作为审计文件的一部分放入审计文档中。</p>	<p>Please communicate ETKO Top Management Representative Dr. Mustafa Akyüz (ma@etko.com.tr - +905426405944) in case of any breach of this policy by one of its employee/auditor. (This is an external complaint mechanism) 如果有 ETKO 员工/审计员违反了本政策，请与 ETKO 最高管理代表 Mustafa Akyüz 博士联系 (ma@etko.com.tr - +905426405944)。(这是一个外部投诉机制)</p>
<p>Name of Client Representative & Signature 客户代表的名字和签名</p>	<p>Date signed 签署日期</p>

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