



## BUSINESS ETHICS AND CODE OF CONDUCT PROCEDURE

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### REVİZYON BİLGİLERİ

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## 1 1. Purpose

This procedure establishes the implementation standards and labor norms that all employees of Arslan Alüminyum A.Ş. must adhere to, regardless of their expertise, qualifications, and position, in accordance with the company's Code of Conduct and its commitment to providing humane working conditions. Our norms regulate employee behavior based on ethics, good faith, honesty, fairness, and ethical working principles aligned with the company's objectives.

## 2. Scope

This procedure applies to all employees of Arslan Alüminyum A.Ş. The Human Resources Department and the Ethics Committee are responsible for its implementation.

## 3. Basis

The procedure is based on the Constitution of the Republic of Turkey, the Universal Declaration of Human Rights, International Labour Organization (ILO) standards, and internationally recognized labor practices.

## 4. Definitions

- **Child Worker:** A person employed under the age of 15.
- **Young Worker:** Individuals between the minimum working age (15) and 18 years old, including apprentices and interns.
- **Corruption:** The abuse of entrusted power for private gain, either directly or indirectly.
- **Bribery:** The offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official in the discharge of their public duties.
- **Discrimination:** Treating individuals or groups differently based on a characteristic they have or are perceived to have, compared to others.
- **Mobbing (Psychological Harassment):** A series of hostile and unethical behaviors by a person or group intended to undermine, isolate, or harass a colleague.
- **Forced Labor:** Work that is performed involuntarily and under threat of penalty.
- **Harassment and Misconduct:** Actions that threaten an individual's physical, mental, or emotional boundaries.
- **Confidential Information:** Any data that should not be disclosed outside the organization.

## 5. Implementation

### 5.1. Ethics Committee Formation

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The Ethics Committee of Arslan Alüminyum A.Ş. is established to investigate complaints and reports of violations of the company's Code of Conduct, assess inappropriate situations, and provide resolutions. The committee is appointed by the General Manager and consists of the following members:

- Deputy General Manager (Chairperson of the Ethics Committee)
- Technical Manager (Member)
- Foundry Manager (Member)
- Human Resources Manager (Member)
- R&D and Quality Assurance Manager (Member)
- Administrative Affairs Manager (Member)

In the absence of the Chairperson, the committee is chaired by the next member in sequence.

### 5.2. Duties of the Committee

1. Promote and reinforce the ethics culture within the organization.
2. Investigate and research behaviors and practices that are contrary to ethical principles.
3. Keep the identity of complainants confidential and conduct investigations with discretion.
4. Operate independently from any hierarchical influence within the organization during the investigation.
5. Investigate all relevant documents and evidence directly from the concerned department.
6. Only examine the information and documents related to the subject of investigation.
7. Ensure that the investigation is documented from the start, with all evidence and documents attached.
8. Expedite the investigation process and reach a conclusion as soon as possible, reporting the results to the General Management and ensuring necessary actions are taken.
9. Conduct the investigation fairly, maintaining confidentiality, and respecting the presumption of innocence until proven otherwise.
10. Provide a written acknowledgment of the complaint, indicate how the matter will be handled, and estimate the time required for a final response.

### 5.3. Code of Ethical Conduct

1. Employees at our factory are selected based on their free will.
2. Company practices comply with all relevant laws and regulations governing employment and working life. Employees fulfill all legal requirements and behave in accordance with legal regulations within the scope of their activities.

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3. A safe and healthy working environment is provided, considering general industrial knowledge and specific workplace hazards. Necessary precautions are taken to prevent accidents and injuries and to minimize health risks to the lowest possible level.
4. All employment decisions are made based on the qualifications of the individual as long as they are related to the job description requirements.
5. The privacy of employees and their family lives is respected. No verbal, written, or electronic communication between individuals can be recorded, shared, or published without their consent.
6. Personal records and payroll information related to the employment relationship cannot be used for purposes other than their intended use and cannot be shared with third parties without the employee's consent.
7. No person under the age of 15 or the age of completion of compulsory education (whichever is higher) will be employed.
8. Apprentices and vocational students (interns) under the age of 15 or the age of completion of compulsory education (whichever is higher) will not be employed at our factory.
9. Our factory ensures compliance with all regulations and requirements related to apprenticeship or vocational education programs and will certify that these are legally recognized programs.
10. Arslan Alüminyum A.Ş. opposes all forms of bribery and corruption. The acceptance or giving of bribes, regardless of purpose, is strictly prohibited.
11. Any relationship with third parties wishing to conduct business with Arslan Alüminyum A.Ş. through bribery or corruption must be terminated.
12. Our employees must not accept cash or equivalent gifts, borrow money from suppliers, consultants, competitors, or customers.
13. Employees are responsible for complying with competition laws in all markets in which they operate and must not infringe on third-party intellectual property rights.
14. Employees of Arslan Alüminyum A.Ş. must avoid any conflict of interest or personal gain.
15. Arslan Alüminyum A.Ş. does not tolerate any violation of anti-money laundering laws.
16. Employees must avoid relationships that could create a conflict of interest regarding the acceptance or offering of gifts, invitations, or hospitality from customers, suppliers, or other third parties.
17. Arslan Alüminyum A.Ş. approaches civil society organizations and political parties with principles of integrity, honesty, and impartiality.
18. We prioritize information security and act in accordance with the company's Information Security Rules and the Personal Data Protection Law (KVKK).
19. Employees may organize reasonable entertainment and dining activities in the business world, or participate in similar activities. Symbolic awards such as plaques and gifts may be accepted as mementos of events attended on behalf of the company, excluding monetary items.

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20. Employees cannot give gifts to organizations or individuals they have business relationships with, except for promotional gifts prepared by the company.
21. Discrimination based on language, race, color, gender, political opinion, belief, religion, sect, age, physical disability, or similar reasons among employees is unacceptable.
22. The physical, sexual, and emotional integrity of all employees is protected.
23. Arslan Alüminyum A.Ş. ensures that its Human Resources policies and practices are fair in all aspects, including recruitment, promotion, transfer, rotation, performance management, compensation, rewards, social rights, and training.
24. All overtime work is performed based on the principles of free will and voluntariness. The daily working hours, frequency, and total hours of overtime for each worker are monitored. Weekly working hours, excluding overtime, will not exceed 45 hours.
25. Contractual/conditional/temporary workers will not be regularly employed for long-term or multiple short-term periods.
26. No tolerance is shown for physical, sexual, and/or emotional harassment of our employees or individuals with whom we have a business relationship, whether at the workplace or in any location related to the business. Negative attitudes and behaviors towards those who report such violations or assist in investigations are considered violations of our ethical code.
27. No tolerance is shown for systematic and planned behaviors aimed at demoralizing, reducing performance, or causing resignation under psychological harassment (mobbing).
28. Access to clean toilets, drinking water, and sanitary facilities for food storage will be provided as needed.
29. All workers have the right to join or form a workers' union and to engage in collective bargaining, free from discrimination.
30. Arslan Alüminyum A.Ş. does not tolerate physical or psychological violence, threats, intimidation, harassment, or abuse against union representatives or workers who wish to join or form an independent and free union.
31. In cases where the right to unionization and collective bargaining is restricted by law, parallel practices that support independent and free unionization and collective bargaining will be facilitated and not hindered by the employer.
32. At Arslan Alüminyum A.Ş., the effective use, proper sharing, and safeguarding of information is a shared responsibility among all companies and employees.
33. Confidential information includes trademarks, intellectual property, innovations, databases, printed communication materials, processes, advertising, product packaging and labels, marketing, product, and technical plans, business strategies, strategic partnerships, financial information, personnel information, customer lists, product designs, management know-how, specifications, potential and actual customer identities, supplier information, and any other written, graphic, or machine-readable information belonging to Arslan Alüminyum A.Ş.

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34. Passwords, user codes, and other identifying information used to access the company's information systems must be kept confidential and not disclosed to anyone other than authorized users.
35. Confidential information may not be disclosed to third parties unless required by law or regulations. Such information cannot be altered, copied, or destroyed. Necessary measures must be taken to carefully store, maintain, and protect this information from unauthorized access.
36. Confidential company information must not be discussed in public places such as dining halls, cafeterias, elevators, or company vehicles.
37. Even if it is not explicitly labeled as confidential, all information and documents of the nature described in Article 25 must be kept confidential, and this responsibility continues for employees during their employment and after they leave Arslan Alüminyum A.Ş.
38. False statements and/or gossip about individuals or institutions are prohibited.
39. Wage confidentiality is essential; wages cannot be shared with third parties under any circumstances.
40. All details related to these rules are published in the Arslan Alüminyum A.Ş. Ethics Rules and Implementation Principles and on our website.

### 5.4. Familiarization with the Procedure

The Human Resources Department is responsible for ensuring:

- The publication and announcement of this Procedure to existing employees and new hires, and familiarizing them with the norms contained within.
- Training is provided to new employees, and refresher courses are conducted annually for existing employees, and notifications are made through the internal communication platform (intranet).
- Employees are informed about the reporting channels in case of violations of these norms.
- Employees are informed of any changes in the Procedure within a month of their implementation.
- The Procedure may be posted in offices and meeting rooms and communicated among employees.

### 5.5. Whistleblowing

As Arslan Alüminyum A.Ş., we prioritize the sustainable implementation and adoption of our ethical rules and the maintenance of our strong ethical behavior culture. We guide our employees to report any violations of legal, policy, or ethical rules they detect or suspect in good faith, without fear of retaliation or victimization, in complete confidentiality.

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Employees can report the following issues within the scope of whistleblowing:

- Violation of laws and regulations to which the company is subject
- Violation of company policies
- Violation of ethical behavior rules

Examples of reportable issues include but are not limited to:

- Corruption (e.g., extortion, bribery, conflict of interest, fraud, money laundering)
- Anti-competitive practices
- Information management violations
- Modern slavery and human trafficking crimes
- Discrimination and harassment
- External stakeholder human rights violations
- Food safety violations

Whistleblowing reports should include as much detail as possible to facilitate a quick and efficient investigation. Reports may be made anonymously. However, anonymity may hinder a thorough investigation, and the investigation may not be possible. Named reports will allow for faster and more efficient investigation by enabling contact with the source if necessary.

The identity of the whistleblower must be kept confidential unless required by law or with the whistleblower's consent. All necessary steps must be taken to protect the whistleblower from retaliation or any form of victimization. Any actions against the whistleblower or anyone involved in the investigation will not be tolerated, and necessary disciplinary actions will be taken.

Actions that may result in victimization include but are not limited to:

- Dismissal or alteration of the position/duties of the employee to their detriment, or providing negative performance feedback that does not reflect their actual performance
- Harassment, intimidation, or bullying
- Threats

When making a report, the employee must have reasonable grounds to believe the information disclosed is accurate. In cases where information provided in good faith is found to be incorrect, no disciplinary action will be taken against the whistleblower. Deliberate false or misleading accusations are considered a serious violation of our Code of Conduct and may result in disciplinary action.

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All employees are responsible for knowing, implementing, and encouraging others to comply with the rules in this Procedure.

### Arslan Alüminyum A.Ş. Whistleblowing Hotline

- Tel: 0228 221 0221-368 (On behalf of the Ethics Committee)
- Email: etik@arslanaluminum.com
- Address: Arslan Alüminyum A.Ş., 1. Organize San Böl. Gazi bulvarı no: 3, Merkez/  
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### 6. Distribution

This procedure is not distributed in printed form. It is published on the shared computer network, where all computer users have view-only access, except for system administrators.

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