

CODE OF ETHICS

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- 1. Integrity and honesty are our prioritised values in all our business processes and relationships.
- 2. Confidential and proprietary information includes information that may create a competitive disadvantage for the Company, trade secrets, financial and other information that has not yet been disclosed to the public, information on personnel rights and information within the framework of "confidentiality agreements" concluded with third parties.
- 3. As company employees; we pay attention to the confidentiality and protection of private information of our customers, employees and other relevant persons and organisations we work with. We protect confidential information regarding the activities of Group Companies, use this information only for the purposes of the Company; we share this information with the relevant persons only within the specified authorisations.
- 4. For us, it is absolutely unacceptable to obtain any commercial benefit (insider trading) by leaking any confidential information belonging to the Company. When leaving our company, we do not take out confidential information and documents and projects, regulations, etc. that we have due to our duties.
- 5. As company employees, we aim to avoid conflicts of interest. By taking advantage of our current position; we do not gain personal benefit from persons and organisations with whom we have business relations personally, through our family or relatives. We do not engage in business activities based on an additional financial interest outside the Company and Group Companies. We refrain from using the name and power of the company and our company identity for personal benefit
- 6. We carry out all our activities and transactions in Turkey and abroad within the framework of the laws of the Republic of Turkey and international law, and provide accurate, complete and understandable information to legal regulatory institutions and organisations in a timely manner.
- 7. While carrying out all our activities and transactions, we stand at an equal distance to all kinds of public institutions and organisations, administrative entities, non-governmental organisations and political parties without any expectation of benefit and we fulfil our obligations with this sense of responsibility.

PREPARED BY
R&D and QUALITY ASSURANCE
MANAGER

APPROVED BY ASSISTANT GENERAL MANAGER



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- 8. We work with a proactive approach that focuses on customer satisfaction and responds to the needs and demands of our customers in the shortest time and in the most accurate way. We provide our services on time and under the promised conditions; we approach our customers with respect, honour, justice, equality and courtesy.
- 9. We ensure that the personal rights of employees are fully and correctly used. We approach employees honestly and fairly, and commit to a non-discriminatory, safe and healthy working environment. We make the necessary efforts for the individual development of our employees, support them in volunteering for appropriate social and social activities in which they will take part with a sense of social responsibility, and observe the balance between business life and private life.
- 10. We avoid taking unnecessary or unmanageable risks and aim for sustainable profitability by prioritising company continuity and in line with the goal of creating value for our shareholders. We act within the framework of financial discipline and accountability, and manage the resources and assets of our company and our working time with the awareness of efficiency and saving. We take care to increase our competitiveness and to invest in areas with growth potential that will provide the highest return on the resources committed.
- 11. We act fairly and respectfully as expected from a good customer, and we show due diligence to fulfil our obligations on time. We carefully protect the confidential information of the persons and organisations we do business with and our business partners.
- 12. We compete effectively, only in areas that are legal and ethical, and avoid unfair competition.
- 13. We support efforts to ensure the targeted competitive structure within the society.
- 14. The protection of democracy, human rights and the environment, education and charity, and the elimination of crime and corruption are very important to us. With the awareness of being a good citizen, we act sensitively as a pioneer in social issues; we try to take part in non-governmental organisations, public interest services and appropriate activities. We are sensitive to the traditions and cultures of Turkey and the countries where we carry out international projects.

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- 15. We do not give or accept bribes or gifts in excess of the intended value, etc. products and services.
- 16. It is essential that employees of the Company and Group Companies avoid situations that may create conflicts of interest. It is one of the most important responsibilities of all employees not to use the Company's resources, name, identity and power for personal benefit and to avoid situations that may adversely affect the name and image of the organisation. The following code of practice sets out the conflict of interest situations that Company employees may encounter in the fulfilment of their duties or in their private lives due to their business relations and the principles to be applied in these situations.
- 17. All Company employees are required to fully comply with the conditions and principles specified below as activities that may create conflicts of interest. The Company carries out the necessary work to encourage its employees to comply with these principles.
- 18. Employees shall not enter into any business relationship with family members, friends or other third parties with whom they have a relationship that provides reciprocal or non-reciprocal benefits under any circumstances. For example, an employee with purchasing authority should avoid doing business with a supplier where a family member works. Exceptional cases are subject to the knowledge and approval of the Chairman of the Board of Directors of the Company. In the same direction, Company employees should be careful against conflicts of interest that may arise due to the employment of close family members in the competitors of the Company.
- 19. Employees may not obtain any commercial benefit by leaking any information belonging to the Companies from inside, nor may they be instrumental in enabling others to obtain any benefit.
- 20. Employees of the company should not engage in activities that require them to be considered as "traders" or "tradesmen" directly or indirectly.
- 21. It is possible provided that it does not create incompatibility with other business ethics rules and policies supporting these rules, and that it does not adversely affect the continuation of their duties in the company, with the written approval of the management.
- 22. Managers who are in a position to make recruitment decisions cannot hire their spouses, close relatives and relatives of these persons.

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