



# ÖZGÖRKEY HOLDİNG CODE OF ETHICS

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# Message of the CEO

## Dear Colleagues,

I am pleased to share with you the updated version of our Özgörkey Holding Code of Ethics, which is one of the most important pillars in keeping our corporate values, which we define as caring for our business, caring for our employees and caring for the environment.

Our Code of Ethics is based on the common values that we all share and to which we will adhere as we work to achieve our business objectives. This manual, which serves as a guide, will also assist us in situations where we may be unsure of our ethical obligations in the performance of our work; it will help us to operate without deviating from the principle of honest and responsible conduct.

Adherence to our ethical principles in our relationships with each other, our business partners, our customers, our suppliers, and all third parties with whom we have business dealings, and the internalization of our values, which are an integral part of our corporate culture, will strengthen our success along the way.

As part of this Code of Ethics, an ethics hotline has been established to support and facilitate the implementation of our ethical understanding and principles. The confidential review and determination of reports made to the ethics hotline regarding suspected ethical violations contributes to our goal of creating a workplace that is consistent with our values, while allowing us to take timely action to address any identified deficiencies.

I would like to thank each and every one of you, in advance, for your ownership and support in building a sustainable company and ideal work environment by living our shared values.

Yours sincerely,

**Armağan ÖZGÖRKEY**

Chairman of the Board of Directors - CEO



## Vision

To be an organization that is recognized as an innovative, sustainable and excellent solution partner with a circular economy approach, continuously improving the synergy it creates with its employees and all stakeholders.

## Mission

To be a sustainable strategic solution partner for our stakeholders with our care for nature, people and the future we will build in better conditions.

## Caring Culture

We believe that success depends on happy team members and a content work environment. We focus on the employee experience by putting people first; we operate with a modern human resources management perspective based on the values of equality, inclusion, solidarity, unity, and lifelong development.

We effectively implement our performance management by setting our individual business and competency targets in parallel with the company strategy and corporate goals.

We prepare our organizational change and development policies to increase the competitiveness of our company and to respond to the needs of today's rapidly changing world.

We continuously develop our sustainable business models with our values of caring for business, employees, the environment and the future.

  
**Vision,  
Mission,  
Caring  
Culture**

### **Respect for Differences at Our Core**

We are 100% committed to the inclusion approach. We believe in the power of diversity and value the contribution of individual differences to our culture. We know that productivity increases in workplaces where diversity is represented and people feel valued as individuals. We embrace different perspectives and believe in common sense.

### **Sensitivity at Our Core**

We strongly believe in contributing to our country and our world. We are aware of our responsibility to future generations. We consider using our living resources sustainably, preventing waste and protecting the future in every step we take and every decision we make.

### **Stakeholder Priority at Our Core**

We consider all our domestic and foreign customers as our business partners; we aim to understand their current and future expectations, offer sustainable solutions to their needs and be their perfect strategic stakeholders.

### **Lifelong Learning is at Our Core**

Our determination to learn is a reflection of our passion for change and development. Our desire to do and improve everything we do better is the source of our enthusiasm for learning. We see continuous development as a great power that will carry our group into the future. As Team Özgörkey, we work with development-oriented approach to implement the knowledge, skills and competencies that will be needed in the world of tomorrow.

### **Team Spirit at Our Core**

We set common goals and share responsibility for achieving them. We believe that there is nothing that cannot be overcome with collective wisdom and effort. We create a free working environment for all Team Özgörkey employees where their ideas are listened to, their successes are applauded, and any obstacles to their progress are removed. We work hard to make each of our colleagues feel like a valuable part of the team.

### **Ownership at Our Core**

We are all in the same boat. We know that the success of one is the success of all. While doing our job, we see ourselves as the owner of the company; we do the right thing for our company with the principle of integrity and honesty.

### **Honesty at Our Core**

We strive to do what we do in the most accurate and best way. We know that success is not an individual but a team effort. We express our thoughts freely and respect different ideas. We work in a free and constructive environment with the principle of transparency and honesty.

### **Equality at Our Core**

Equal pay for equal work is our most fundamental principle. We create equal opportunities for everyone, everywhere. We see the concept of equality as our indispensable priority, and we put egalitarian practices at the core. We strive to create work environments suitable for the needs of our teammates, regardless of any differences. We provide equal opportunities to all our teammates working in production or administrative units, regardless of their position, title, experience, age, beliefs, whether male or female, office worker or field worker.

### **Participation at Our Core**

We care about the opinions and suggestions of our teammates in every field. All suggestions, big and small, are the most effective and fastest way for us to further improve our system and continuously develop. We see our teammates who bring up the areas of development and points of improvement they see and contribute their suggestions for solutions by entering them into the "Suggestion System" as the assurance of our product and service quality and our sustainable business model.



# Code of Ethics ■

## Implementation Guide

Özgörkey Holding Code of Ethics has been prepared to regulate the relations between Özgörkey Holding and all relevant stakeholders (our employees, customers, competitors, shareholders and suppliers).

Özgörkey Holding expects all board members, managers and employees to fully comply with the Code of Ethics under all circumstances. No special privileges are granted to anyone subject to this code. The content of the Code may be changed if deemed necessary by Özgörkey Holding for any reason that is not contrary to the law. Our company is obliged to inform employees about the changes made. Özgörkey Holding Code of Ethics is published on our company's website and is public information.

Özgörkey Holding Code of Ethics contains rules and codes that will guide you at every moment of your working environment. If one of your managers asks you to violate any article of the Code of Ethics, you are expected to warn your manager about this issue. If your manager persists in such behavior despite your warnings, you must act in accordance with the guiding principles contained in this code.

Acting in violation of Özgörkey Holding Code of Ethics and related company policies and legal regulations is considered a serious violation and may result in sanctions such as termination of the employment contract, initiation of legal proceedings, etc., which may vary depending on the type and scope of the violation. These sanctions apply not only to employees who misconduct their duties, but also to those who ignore this situation, fail to notify in a timely manner, or fail to take the necessary actions to prevent, catch or report the action, or who prevent those who are trying to prevent potential violations.

## 1) EQUAL AND HEALTHY WORK ENVIRONMENT

Özgörkey Holding employees fulfill their work on the basis of honesty and integrity. They show the necessary support and care in creating a professional working environment.

Özgörkey Holding expects all employees to be respectful to managers, customers, colleagues and suppliers, and to behave impartially, honestly, transparently, fairly and consistently in a manner befitting the reputation of the company in the environments where the Holding is represented.

### 1.1. Human Rights

Özgörkey Holding recognizes and values the ethnic, religious and cultural differences of employees, customers, suppliers and other social stakeholders. Özgörkey Holding expects its employees and all stakeholders to respect human rights and be sensitive to violations.

Özgörkey Holding is against all forms of discrimination. It does not tolerate possible discrimination and harassment based on religion, language, race, color, gender, age, political opinion, ethnic origin, disability, citizenship or other social status. The concept of harassment is not limited to racism, sexual or ethnic content, but also includes any kind of intimidation, aggression or insulting behavior or words (mobbing) in the work environment.

Report any form of discrimination or harassment to your manager and/or immediate manager or the ethics hotline. You can contact the ethics hotline directly in cases where your report concerns your supervisor/ senior manager or if you encounter a negative situation while telling your manager about what you have experienced. If you think that the behavior or remark was unintentional and you will not feel uncomfortable, you can also discuss the matter directly with the person who engaged in this behavior.

### 1.2. Working Conditions, Occupational Health and Safety and Technical Security

Fair working conditions are one of the top priorities of Özgörkey Holding. We protect the rights of our employees and keep occupational health and safety standards at the highest level. It is our most fundamental responsibility as an employer to ensure full compliance with applicable legal regulations on issues such as working hours, wages and leave rights. We believe that everyone should have equal opportunities and their talents should be evaluated fairly.

Özgörkey Holding is committed to providing a safe working environment for all its employees. Employees are expected to comply with legal regulations. If you have any doubts about occupational health and safety or technical safety, immediately report the situation to your manager or the ethics hotline.

If you are a manager, make sure that your colleagues who report directly to you receive the necessary training on health, safety and security issues that may pose a risk to them in the work environment, comply with all laws and regulations, and act in accordance with corporate policies and principles. Always pay utmost attention to health, safety and security issues reported to you. Share potential risks immediately with your immediate supervisor and/or a senior manager or the ethics hotline. If you feel that your immediate supervisor has not taken the necessary actions or if there is a potential non-compliance, report the situation to the ethics hotline immediately.

Özgörkey Holding measures and monitors the occupational health and safety performance of its companies. Occupational accidents that occur in the work environment and due to the work performed are also within this scope. When you experience any occupational accident, immediately contact your manager and follow the necessary corporate procedures. Your manager will share the situation with the Human Resources department and ensure that necessary actions are taken.

### **1.3. Zero Child Labor**

As Özgörkey Holding, we always take into consideration the importance of the young population and the contributions it will make to our future as a society and we attach importance to this situation in our working conditions. Accordingly, we carry out our activities in accordance with the minimum age provisions specified in the constitution, labor law and relevant legislation, and we do not employ child labor in our companies. We do not tolerate child labor, slavery, human trafficking and forced labor.

### **1.4. Workplace Violence**

Özgörkey Holding absolutely does not tolerate threats and harassment, hostile or abusive words and behaviors in any vehicle, building, office or unit belonging to the company. When such a situation is encountered, the actions specified in the company policies and procedures are applied, starting from terminating the employee's employment and extending to initiating legal proceedings.

Özgörkey Holding employees cannot keep weapons or parts of a weapon in any part of the company's buildings or units. If you encounter any kind of violence, hostile attitude and behavior or possession of a weapon in one of the company units, immediately notify Özgörkey Holding security unit and your immediate manager.

Domestic violence also often jeopardizes the safety of company employees in the workplace. If you are faced with such a situation, please inform the police and then our company security units for your own safety and the safety of your colleagues. In addition, if you feel that you need support in these matters, please contact the Human Resources Department.

### **1.5. Use of Harmful Substances, Drugs and Gambling**

It is strictly forbidden to use, carry, produce, trade or give illegal drugs, alcohol, narcotics, etc. harmful to human health (except for medicines recommended by your

doctor with a prescription) during working time, within the company premises or during the use of company-owned vehicles and equipment. You may not work in the workplace while using drugs containing narcotic substances whose use is prohibited or restricted by law. Your employment contract will be terminated if a doctor's report confirms such a finding.

If you are taking any medication that could jeopardize your safety, you must inform your supervisor. If the medication you are taking slows your judgment, physical activity or reduces your alertness, you must not use any company-owned vehicles or equipment.

If you encounter any legal proceedings related to the use of drugs or other substances that are harmful to human health or illegal, you must immediately report the situation to your supervisor.

It is strictly forbidden to play games of chance (including sports lotto and toto or betting games) or gambling within the company, through company systems or during working hours while doing your job for which you are responsible, and it is against Özgörkey Holding Code of Ethics. Employees do not make a habit of gambling or playing games of chance even outside of working hours.

You may not drink alcohol or suggest that your colleagues drink alcohol in your daily work life or when using any of the company vehicles or equipment.

If you face legal proceedings related to alcohol use, you must immediately report the situation to your supervisor and the Human Resources department.

### **1.6. Aid and Fundraising**

It is strictly forbidden to collect funds, donations, distribute relevant announcements and participate in such activities during working hours (including collecting aid and donations or supporting such activities) in writing, verbally, via the internet or by using company tools and equipment (e-mail, fax, computer, telephone, internal communication tools, etc.) that are not related to your work within the company.

All aid and donation campaigns attributed to Özgörkey Holding or organized and managed by Özgörkey Holding employees must be approved by the Board of Directors of Özgörkey Holding and must comply with company policies and principles.

### **1.7. Confidentiality of Employee Data**

Özgörkey Holding may use the personal and numerical information of its employees within the scope and limits of the legal regulations for the purpose of improving and organizing the company's operations and for other studies that may benefit its employees. Everyone is expected to protect the private information of employees (Turkish ID number, Internet and computer passwords, financial information, home addresses and telephone numbers, private mobile phone numbers, etc.) that you have due to the unit you work in and the operations you are involved in.

Do not share the personal information (including remuneration) of your colleagues in the records of our company with people inside or outside the company under any circumstances, except for a legal process or due to your position in the company and with the permission of the person to whom the information belongs. Sharing employee information with third parties without valid and legal reasons is in violation of company policies, Özgörkey Holding Code of Ethics, PDPL (Personal Data Protection Law) regulations and in some cases legal regulations.

### **1.8. Monitoring During Work**

Özgörkey Holding has the right to control the company communication tools, computer and internet usage of its employees to the extent permitted by law in order to protect company assets, to provide an appropriate level of service to customers, to create a safe working environment for our employees and to prevent inappropriate use. Again, provided that it is in compliance with the relevant laws and regulations, Özgörkey Holding may inspect and investigate all company assets, communication and transportation tools, systems and other company equipment provided by the company to employees, with or without notice, whenever it deems necessary, only for purposes in favor of Özgörkey Holding, and may request relevant legal investigations.

### **1.9. Use of Recording Equipment**

In many public or private institutions, the use of recording devices without the consent of the relevant parties is considered illegal. Except for the cases approved by the Board of Directors of Özgörkey Holding, you may not photograph, video or audio record another employee, the systems, records or other tools used by the employee without the knowledge and consent of the employee under any circumstances within the company. Again, you may not record the image or voice of any of our customers, suppliers or business partners without the consent and knowledge of the relevant persons.

### **1.10. Unethical Behavior Outside the Workplace**

Özgörkey Holding employees should not engage in unethical behavior outside the workplace that may negatively affect their motivation to work or damage the company's reputation and business relations outside the workplace. In such cases, immediately notify your manager and/or your immediate supervisor or the ethics hotline. When you encounter any behavior that may constitute a grave crime according to the laws of the Turkish Republic, or when you suspect that such behavior may occur, you should immediately contact your supervisor and/or senior manager or the ethics hotline.

### **1.11. Public Statements and Public Behavior**

Özgörkey Holding employees may freely express their opinions within the framework of the principle of freedom of expression. However, employees who share their views on public platforms should take care to emphasize that these are only their personal views and do not represent the views of the company. Necessary sensitivity should be shown to ensure that behaviors and expressions in public environments do not harm the reputation of the company.

### **1.12. Environment**

As Özgörkey Holding, we see our responsibility to protect the environment as an integral part of our business. We adopt sustainability principles in our operations and strive to minimize our negative impact on the environment. We strive for continuous improvement in the protection of natural resources, energy conservation and waste management. One of our most important responsibilities is to fully comply with environmental regulations and to train our employees in environmental awareness.

Employees are expected to conduct their work in a way that respects the environment and complies with legal regulations. If you suspect any environmental damage, report it immediately to your supervisor or the ethics hotline.

If you are a manager, ensure that your direct reports receive the necessary training on environmental issues in the workplace, comply with all laws and regulations, and act in accordance with company policies and principles. Always pay close attention to environmental issues reported to you. Immediately report potential risks to your supervisor and/or a manager or to the ethics hotline. If you believe that your manager has not taken the necessary action on the issue or if there is a potential violation, report the situation to the ethics hotline immediately.

## **2) HONESTY AND FAIRNESS IN THE WORKPLACE**

Özgörkey Holding's corporate reputation also depends on the conduct and integrity of its employees. It is very important that you avoid any relationship or activity that may affect or even potentially affect your impartiality and fair decision making while performing your job. If the legitimate interests of Özgörkey Holding are in question, it is the duty of the employees to protect these interests to the end for the benefit of our company. It is strictly forbidden to use Özgörkey Holding's assets and company information for your personal interests.

### **2.1. Avoiding Conflicts of Interest**

In order to prevent existing or potential conflicts of interest, you must comply with the principles set forth in the Özgörkey Holding Code of Ethics. Our employees do not engage in any work or communication that may constitute a conflict of interest, and in risky situations, you should immediately contact your supervisor and/or a senior manager or the ethic hotline without wasting any time.

### **2.2. Conflicts of Personal Interest**

It is against Özgörkey Holding's Code of Ethics for you to be the manager of the members of your family with whom you have a personal (private) relationship, people with whom you have an emotional relationship, or people with whom you have a close relationship in any way, or to take over the supervision of these people in a project. In addition, if other companies where these people work have a business relationship with Özgörkey Holding (business partnership, supplier relationship, etc.), it is not possible

for you to participate in any decision making process regarding these companies. If you are involved in such a situation, you must immediately disclose the matter to your manager and/or your immediate supervisor or the Human Resources Department. It is prohibited to use your position and authority within the Company for your personal interests or the interests of your friends or relatives.

### **2.3. Working Outside the Organization**

Without the knowledge and approval of Özgörkey Holding, it is strictly forbidden for you to work in an institution or organization that is a supplier, subcontractor, customer, business partner or competitor of the company, to provide consultancy to these institutions, to be in any joint work (paid or unpaid). Likewise, it is forbidden for you to work (paid or unpaid) outside the organization and to engage in commercial business relations without the written approval of the Human Resources department and your manager.

### **2.4. Other External Activities**

A conflict of interest may arise if our employees who are members or work in the management or working groups of alumni associations, various cooperatives, non-governmental organizations are in decision-making positions regarding Özgörkey Holding's products and services. If you are in such a position, you should not participate in the decision-making mechanisms regarding the products and services of Özgörkey Holding or its competitors. Disclose your situation to the authorities of the organization without including our internal information and indicate that your position in the organization may conflict with the interests of Özgörkey Holding.

### **2.5. Conflicts of Political Interest**

Özgörkey Holding employees are expected to fully comply with laws and regulations in their relations with officials of official organizations, including financial, government ethics and lobbying. In addition, meetings and activities to be carried out with official organizations on behalf of the company can only be carried out after approval by the senior management of the company.

### **2.6. Personal Political Activity**

Your political cooperation and activities should be kept completely separate from your work and activities in the company. If you are involved in such activities, it is against the Code of Ethics to use the name of Özgörkey Holding, your work in the company and the company's assets for this purpose. In the event of a situation such as appearing before the officials of an official institution in which Özgörkey Holding is involved or which is within the sectoral field of interest of Özgörkey Holding, you must clearly declare that you are not representing Özgörkey Holding and inform your supervisor about the issue.

### **2.7. Using Corporate Assets for Political Support**

You may not provide any corporate support or assistance, whether in cash or in kind, to any political party, political party candidate, political campaign, or official

representative of any public institution in a manner that is not in compliance with legal regulations and without the approval of Özgörkey Holding's senior management and Legal Department. In addition, you may not coerce any of your colleagues in the Company to participate in political mechanisms or to support such structures.

### **2.8. Relations with Public Institutions**

You may not take part in activities related to any of the public institutions and organizations, including local governments (committee membership, public schools, various volunteer positions in charity centers, etc.) without the knowledge of the company and your manager, and you may not use company assets.

### **2.9. Credit and Debt**

It is strictly forbidden for Özgörkey Holding executives who are authorized signatories to personally borrow money from our company as it is against TCC No. 6762. personal loans of more than TL 1,000 between managers and employees who are directly subordinate to each other among the employees of the company are also against the Code of Ethics. In addition, our employees do not borrow more than their financial capacity and make sure that their expenses are proportional to their income.

### **2.10. Mandatory Notifications for Employees**

Employees are required to inform their supervisors and the Human Resources Department of any investigation initiated by the Public Prosecutor's Office against them for any reason other than their duties or responsibilities at Özgörkey Holding, as well as any lawsuit filed against them other than divorce, custody or inheritance disputes.

## **3) PROTECTING THE ASSETS AND REPUTATION OF ÖZGÖRKEY HOLDING**

### **3.1. Accurate and Valid Information**

Özgörkey Holding is committed to sharing accurate and valid information about the company with the public and relevant legal authorities in a timely manner in accordance with all legal regulations.

### **3.2. Accurate and Valid Data/Records**

Our most important expectation of you is that you prepare valid reports and records, taking care to ensure that the work performed and the activities carried out (time of reporting, missing information in the report, efficiency, citations and all details, including quality control) fully and accurately reflect the facts.

Immediately inform your manager if you notice or are alerted to inaccurate or incomplete information in your records. Inform customers or suppliers where necessary and where they are directly involved.



Özgörkey Holding does not tolerate any errors or falsifications in its records and documents.

### **3.3. Transparent and Full Disclosure**

Özgörkey Holding is meticulous about transparency in financial reporting so that relevant stakeholders can make decisions based on accurate information about the company's activities.

Do not, under any circumstances, mention Özgörkey Holding's operations, business plans, financial status, financial results or any developments or plans about which you have information about the company in your personal relationships, face-to-face or in small discussion groups or meetings, including your colleagues within the company.

Be especially careful not to disclose such information when making proposals or presentations to customers, suppliers or third parties. Özgörkey Holding cooperates with various internal and external auditors to ensure valid reporting. If necessary, please ensure that you provide complete and accurate information in all audits conducted with the knowledge and approval of the company. During such audits, do not try to persuade, direct or interfere with the concrete data in any way. Failure to provide accurate and timely cooperation during an audit or similar investigation will result in sanctions, up to and including termination of employment.

### **3.4. Security and Protection of Company Records**

Company records must be kept and secured in accordance with legal regulations and Özgörkey Holding policies and principles.

You may not destroy, alter, modify, change or delete company records for which you are responsible.

If you have any suspicion that company records have been altered or falsified, immediately notify your manager and/or immediate supervisor or the ethics hotline. If you are asked to interfere with company records in a similar way by individuals or organizations from within or outside the company, inform the ethics hotline and do your best to protect the records.

### **3.5. Proper Use of Company Assets**

You must always protect any tangible or intangible assets belonging to Özgörkey Holding that are entrusted to you by customers or business partners. Company assets, assets of business partners, individual or corporate customers, regardless of their condition or value, may not be bought, sold, rented, lent or disposed of without special authorization. Unless otherwise stated in the company's written policies, it is strictly inappropriate to use Özgörkey Holding's machinery, equipment or vehicles, electronic devices or special discounts or free tools used without the company's approval for personal purposes.

### **3.5.1. Employee Benefits**

The benefits provided by Özgörkey Holding to its employees and the programs implemented must be used honestly and fairly. When applying for a job or renewing your employee information, provide accurate information about yourself, including your health status and dependents. In addition, if you are absent from the company, provide your manager with accurate information about your exact whereabouts and the business for which you are absent. Your accurate information is very important to the fair distribution of benefits and to ensuring that you and your colleagues receive the full value of those benefits.

### **3.5.2. Effective Use of Company Property and Assets**

All Company assets and monetary resources of financial value must be used responsibly and honestly in accordance with Company policies and principles. The use of company assets for personal purposes or without the knowledge of the company is strictly prohibited.

### **3.5.3. Working Hours**

Be sure to keep valid, consistent, and accurate records of your working hours. Do not force other employees to engage in behaviors such as under-reporting or over-reporting of work hours. By recording your hours regularly and as expected, you verify that you are at work at the correct time and that there are no unrecorded hours. If you have any concerns or questions about this issue or your paycheck, you can contact Human Resources.

## **3.6. Use of the Company's Communication and Information Systems**

All of Özgörkey Holding's information and communication systems, including computers and mobile devices provided to you to perform your duties in the company, are valuable company assets that must be protected by all of our employees.

It is your responsibility to ensure the security of your user ID and password that you use to access Company computers, electronic networks or mobile devices. All electronic devices and materials, such as computer programs, files, data downloaded from public networks made available through the Internet, or electronic information received from third parties, must be checked for viruses and other harmful programs before use. Only programs approved and licensed by the Information Technology Department may be used on the Company's computer systems. Always be aware of the relevant values, policies and procedures when using Company data, entering the systems, making changes, deleting information or commenting on Company information on public platforms on the Internet.

### **3.6.1. Banned Actions**

You may not use Company systems (e-mail, instant messaging, Internet) illegally, in violation of Company policies, or in any way that could have consequences that could damage the reliability and reputation of the Company, such as the following examples

- Pornography, profanity, offensive, discriminatory or offensive content,
- Chain emails, ponzi schemes or mass emailing without company approval,
- Applications for communicating with a person or organization on behalf of commercial ventures,
- Communication practices that directly target a group or unit of company employees on behalf of an external institution or organization,
- Large personal file records containing graphic or audio material, or downloading them over the internet,
- Use of copyrighted materials of individuals and organizations,
- The use of malicious computer programs, software or any other electronic material that could compromise the security of the company.

In addition to the examples described above, you are prohibited from sending non-public Company information to your personal e-mail address or to any other message service that is shared with other users without the knowledge of your manager.

### **3.7. Security of Company Operations**

Personal information about our customers and employees, systems and facilities related to electronic networks, computer systems and passwords, security procedures, Company facilities and areas served by the Company, technical and market research data, information related to product and service development, business plans and strategies are assets that must be kept confidential and secure. You must take the necessary precautions to protect them. In addition, you should promptly report to the Security Department any incidents and/or suspicious persons that you believe may constitute a crime.

### **3.8. Intellectual Property Rights**

The use of Özgörkey Holding's trademarks, logos or similar materials that belong to Özgörkey Holding in accordance with the applicable laws on the protection of intellectual property rights is considered to be within this scope. In order to prevent the illegal copying and use of Özgörkey Holding's intellectual property rights, you can report the measures taken in the areas of use and on these issues, what needs to be done and your questions, if any, to the Legal Department in accordance with the company's practices and procedures.

#### **3.8.1. Correct Use of the Intellectual Property Rights of Third Parties**

We must pay particular attention to compliance with laws, regulations and contracts that protect the intellectual property rights of all our individual and corporate clients, individuals and organizations, including our competitors.

#### **3.8.2. Information Security of Former Employers**

Your previous employers may have asked you to sign contracts and agreements that could affect your performance at Özgörkey Holding. If you did not report such arrangements during your employment procedure upfront, please inform your supervisor immediately.

### **3.9. Use of External Communication Channels and Social Media**

It is against Özgörkey Holding Code of Ethics to say that you are speaking on behalf of Özgörkey Holding when you express your personal opinions in public places, during your professional or cultural activities or on platforms on the internet (on social media, Instagram, Facebook, Twitter, etc.) without company approval. The use of the company's brands and logos must be in accordance with the technical standards set by the company. You can share your concerns and questions on the subject with the Corporate Communications department.

## **4) HONESTY AND JUSTICE IN THE MARKETPLACE**

Özgörkey Holding's perception as an honest company in the areas it serves, its reliability and superior service quality are the key elements of its reputation.

### **4.1. Customer Relations**

Özgörkey Holding's customers expect and deserve fair, honest and respectful service. As employees and key stakeholders of Özgörkey Holding, you are responsible for providing this service.

#### **4.1.1. Client Information Security**

The policy implemented by Özgörkey Holding regarding the security of the information of our customers includes the information about our customers that is kept in the records of our company and the purposes for which this information is used. You can contact the Internal Audit and/or IT Department for systems related to our customers' information security and your concerns regarding this issue.

Suppliers and third parties doing business with Özgörkey Holding are also expected to pay special attention to protecting Özgörkey Holding's customers' information. If you are concerned that customer information is being accessed, used or destroyed by outsiders without the company's knowledge and consent, report the matter immediately to your supervisor and/or manager or the ethics hotline.

#### **4.1.2. Fair Trade**

Özgörkey Holding's policy requires us to provide customers with complete, timely, clear, understandable and accurate information about the products we sell. Actions such as providing customers with incorrect or incomplete information about products, misleading or deceiving them is a major disciplinary offense that may lead to the termination of your employment contract.

All customer complaints must be addressed, realistically assessed and recorded.

Özgörkey Holding does not accept any form of behavior that is defamatory, anti-competitive and unfair to its competitors. Therefore, you are expected to be open, clear and honest when you need to make comparisons with competitors' products

and services during sales and marketing activities. Özgörkey Holding delivers its products to its customers by applying fair marketing and sales methods. Therefore, please refrain from making false, incomplete and misleading statements about our competitors' products.

#### **4.1.3. Relations with Government Agencies**

Özgörkey Holding undertakes to comply with the principle of fair and transparent business conduct in its relations with all stakeholders. It is strictly forbidden for Özgörkey Holding's executives, employees and business partners to make payments, give gifts, offer payments or gifts or make commitments for similar purposes in order to obtain benefits contrary to laws and regulations, to influence the decisions of individuals or institutions in their relations with government agencies and other stakeholders.

When dealing with a government agency as a customer, you should confer with legal counsel, as appropriate, in accordance with Company practices and procedures, as there may be changes in laws and regulations and important procedures to follow and consider. You are also expected to exercise the utmost caution and comply with applicable laws and regulations when conducting business with government agencies, particularly in the areas of giving and receiving gifts, supporting special events, sponsorship activities, invoicing and transparency of relationships with government employees.

#### **4.2. Selection of Suppliers and Relations with Suppliers**

Özgörkey Holding expects you to be fair in the selection of suppliers who have an important share in the quality of Özgörkey Holding's products, in your relations with them and in the decision making process. The following issues should be considered by Özgörkey Holding employees who are involved in the selection of suppliers in any way:

- Manage a selection process that is fair, in compliance with laws and regulations, free from direct or indirect discrimination, and in accordance with the principles and policies of Özgörkey Holding.
- Make sure that the suppliers or business partners with whom you cooperate are companies/individuals that comply with the strategies and policies of Özgörkey Holding, implement all the conduct specified in the Code of Ethics, and fully understand and grasp the focus areas of our business.
- Maintain hard copies of all supplier contracts and ensure that the necessary unit approvals and signatures are obtained prior to final approval signatures.
- Do not share any confidential company information between suppliers.
- Do not provide any information to other suppliers, third parties outside the company regarding agreements, contracts, business processes carried out with suppliers. Such information can only be shared with the relevant units in the business processes of our company and can be used for business purposes.

### **4.3. Gift Giving and Receiving**

Exchanging gifts or attending various events with friends can solidify your business relationships and are considered acts of goodwill.

When faced with situations such as invitations, gifts, or attendance at events that you are required to accept because of your business, you should consider and take into account the impact it may have on third parties, rather than the monetary value of the gift being offered. If you send gifts to customers or suppliers for business purposes or invite them to events, it is absolutely not correct to pay for the expenses out of your own personal funds. Keep in mind that such activities must be carried out from the approved company budget and within the established approval limits, and make sure that they are fully and accurately recorded in the company's records.

If the value of the gift given to you exceeds the principles and standards of Özgörkey Holding's Code of Ethics, refuse the gift by stating that your company's Code of Conduct does not allow you to accept such a gift.

If the gift is non-returnable (perishable food, etc.), it will either be donated to a charity with the company's approval and name, or it will be shared by employees within the company. Even for this kind of sharing, the financial value of the gift cannot exceed €100 per person in a calendar year. If you have received a gift that violates the relevant articles of Özgörkey Holding Code of Ethics and you are unable to return the gift, please notify your manager and/or senior manager.

#### **4.3.1. Acceptable Gifts**

A "gift" is the name given to any type of item, whether tangible or intangible, that would make you or a member of your family, or people with whom you have a close relationship, happy and would help to strengthen those relationships. This includes tickets to events organized for marketing and promotional purposes, food and beverages, attendance at cultural or sporting events, and related invitations.

To be acceptable, gift-giving and gift-receiving activities must not only be legal, but also meet the following criteria:

- It should not be done against the will of the other person.
- It should not be cash or a gift that can be used as money (gift certificates, cards, etc.).
- It must not have a monetary value that would make third parties feel uncomfortable or suspicious (it is inappropriate to accept gifts of more than \$100 in one calendar year from the same person or organization).
- Your manager should be aware of the issue.

#### **4.3.2. Acceptable Events**

Meals, sporting or cultural events that you attend with a customer or supplier or business partner are considered acceptable events. However, situations in which only you can participate (tickets, invitations, special reservations, etc.) are not considered as

participation in an event, but as “accepting gifts”. In order for participation in an event to be acceptable, it must comply with the following conditions:

- It must comply with the law and regulations.
- There should be events where our employees, as well as suppliers, business partners or third parties, attend and discuss business.
- The cost of one person’s participation in the event should not exceed €50, except when approved by the CEO and directors of Özgörkey Holding.
- Participation in invitations or similar activities that may damage the reputation of Özgörkey with respect to the content of the event, its location and other participants, and that may violate the Code of Ethics is strictly inappropriate.

#### **4.3.3. Prohibited Purchases**

Even if a gift or participation in an event complies with the above principles;

- If it is an element that can have an impact on your business decisions,
- It affects the environment in which you can make a fair, appropriate and uninfluenced decision, or it would have a negative and inappropriate effect on the other party,
- If you are in any way involved in the selection process of the person or organization providing the service or managing the selection process,

It is not appropriate to receive or give gifts or attend entertainment. In addition, under no circumstances may any of our employees receive or offer commissions as part of their job.

#### **4.3.4. Accepting Gifts Outside the Workplace**

In some cases, you may have close friendships with your customers or suppliers. Gifts may be exchanged outside the company for special occasions such as weddings, birthdays, or the birth of a child. As long as such situations do not occur frequently, you should inform your manager so that there are no conflicts or elements that could compromise your business decisions.

#### **4.3.5. Accepting Gifts or Event Invitations from Public Servants**

When engaging in business relationships with public officials, you should act in accordance with all laws and regulations and ensure that these relationships are transparent. Please note that public officials may be subject to different laws and regulations regarding giving or accepting gifts. All Özgörkey Holding employees who have business ties with public officials on behalf of Özgörkey Holding are required to comply with the relevant laws and regulations. If you want to know more about the relevant laws, you can contact the Legal Department according to the company’s procedures and practices as needed.

#### **4.4. Anti-Bribery, Anti-Corruption, Commissions and Debt**

At Özgörkey Holding, it is strictly prohibited to offer or give bribes or commissions, which constitute a criminal offense. Bribery and corruption will not be tolerated in any

way. It is imperative to adhere to the principles of honesty, transparency and fairness in our business activities. If you encounter such an offer, report it immediately to your manager and/or direct supervisor or to the ethics hotline. It is also strictly prohibited to solicit personal loans from customers, suppliers, competitors of Özgörkey Holding and other third parties, or to request special privileges or discounts other than those offered to everyone. In case of such an offer, observation or suspicion, the situation should be reported to the manager and/or **etikhat@ozgorkeyholding.com**

#### **4.5. Preventing Money Laundering**

Money laundering is the act of attempting to conceal the source of the proceeds of a crime. Money laundering is a very serious offense in the opinion of the authorities. The commercial and financial reliability and reputation of all potential customers and suppliers are analyzed before entering into a contractual relationship. Extreme caution must be exercised with respect to payments made to or received from parties not classified as approved suppliers or customers, and immediate steps must be taken to resolve any discrepancies. Özgörkey Holding employees are strictly prohibited from participating in or facilitating any transaction intended to conceal the source of funds.

#### **4.6. Relations with Departing or Former Employees**

You are expected to comply with the principles and policies of Özgörkey Holding not only while you are working for the company, but also after your employment ends. Below are the rules that apply to all current, future or retired employees of Özgörkey Holding:

- When you terminate your employment or retire, make sure that you return all assets (including company records and equipment) given to you by the company.
- You may not use or disclose any contract you have made with Özgörkey Holding or any information and documents related to your employment status. If a former employee forces you to provide information on this matter, please share the situation with your manager and/or your immediate supervisor.
- You may not establish a business relationship with a former Özgörkey Holding employee, seek independent consultancy from him/her, or establish a contractual or non-contractual business relationship with him/her until at least 6 months after his/her termination of employment. However, with the written approval of the Özgörkey Holding Board of Directors, you may establish a business relationship with a former Özgörkey Holding employee within 6 months after his/her termination of employment. Even 6 months after the former employee's departure, you must inform your manager about the situation when it comes to purchasing goods and services from the company he/she works for.
- If you believe that a former Özgörkey Holding employee has unfairly benefited from corporate information obtained while working for the company, or if you realize that a former Özgörkey Holding employee has illegally accessed company information even after leaving the company, immediately report the matter to your manager and/or immediate supervisor or the ethics hotline.



## 4.7. Relations with Competitors

Özgörkey Holding's business approach is based on ethical, fair and effective competition. Özgörkey Holding's products are sold based on their value, superior quality and competitive prices.

In case of any questions with regard to the scope of these activities, which are summarized below, please contact the company's legal counsel.

### 4.7.1. Gathering Information on Competitors

We know that it is acceptable to have information about our competitors if it is in accordance with the law. The means by which you obtain such information is evaluated within the framework of the Özgörkey Holding Code of Ethics. It is not against the Code of Ethics to use public platforms to collect such information. In addition, your identity should be clear in such studies and should not contain misleading identity information. In addition, if the third parties and consultants with whom you do business have non-public information about Özgörkey Holding, they should also act within the framework of the Özgörkey Holding Code of Ethics. If you have any doubts about whether information about your competitors that you receive through your customers is also public information, you should always seek advice before using such information.

### 4.7.2. Avoiding Circumstances in Violation of Competition Laws

The Turkish Competition Law No. 4054, "Law for the Protection of Competition", prohibits inter-organizational agreements, related actions and such decisions and actions of business associations that directly or indirectly prevent, distort or restrict competition in a particular goods or services market or that have or may have the effect of preventing, distorting or restricting competition.

Competition law primarily prohibits all activities that prevent or restrict competition, divide markets, fix prices through agreements with competitors, or cause bid rigging. Competition law also imposes restrictions on the conditions under which certain operational and marketing decisions can be made.

Acting in violation of the law will have criminal consequences for both you and Özgörkey Holding. The activities and behaviors detailed below are strictly prohibited:

**Price Fixing:** You may not agree or fix the selling prices of products and services with any competitor.

**Market Sharing:** You may not exchange views with your competitors or enter into market sharing agreements with your competitors in areas or customers where competitors or Özgörkey Holding compete.

**Bid Rigging:** You may not engage in collusion with your competitors to change the outcome of a tender or to determine the content of the process. You may not communicate with companies you are bidding with about the tender.

**Boycott:** You may not boycott a supplier or customer because it has a business relationship with one of your competitors. Such a boycott may have consequences that may lead to violations of competition legislation.

**Misrepresentation-Slander:** When talking about a competitor or making comparisons, do not include any statements other than concrete data.

#### **4.8. Relations with Subsidiaries**

In relations with companies (and related persons) owned by Özgörkey Holding or in which Özgörkey Holding holds more than 50% of the shares; ensure that all transactions (including special pricing and discounts for subsidiaries) and payments are made in accordance with company policies, all laws and regulations, kept on record, and that all transactions are carried out in a transparent manner.

#### **4.9. Relations with Related Parties**

Özgörkey Holding's relations with all related parties, including its subsidiaries and affiliates, are governed by the policies and principles set forth in Özgörkey Holding's Code of Ethics and are conducted within the framework of relations with third parties. It is essential that Özgörkey Holding's executives and employees take into account Özgörkey Holding's Code of Ethics and act accordingly while conducting any kind of information, payment and other business relations.

#### **4.10. International Relations**

Özgörkey Holding is also obliged to comply with the Laws and Regulations of the countries in which it operates and is obliged to comply with the Laws and Regulations of the Countries in which it operates. If your business or the business of those you manage involves customers or suppliers from another country, you should be aware of these laws and regulations that may affect your business. Cultural differences and local customs or different laws can cause problems in some cases. Therefore, it is important that you have this information in hand before the start of your business.

##### **4.10.1. Services Received from Abroad**

In case of purchase of services or advice from a country other than Turkey, please consult legal counsel in accordance with our company's procedures and practices in regard to the laws and regulations of that country.

##### **4.10.2. Compliance with Law and Regulations**

Özgörkey Holding is always in compliance with the laws and regulations of the countries in which the institutions with which it has business relations are located,

especially the legal regulations in foreign payments and business activities with suppliers. It is essential that all third parties who do business with Özgörkey Holding also comply with these laws and regulations.

#### **4.10.3. Import/Export Control**

It is the policy of Özgörkey Holding to comply with all import and export laws and regulations (including the laws of the countries we do business with). Failure to do so may result in great material and moral damage to our company, as well as the cancellation of Özgörkey Holding's import/export certificates, the complete closure of its business operations, and great damage to its brand reputation.

## **5) ETHICS DISCLOSURE MANAGEMENT**

### **5.1. Roles and Responsibilities in Ethics Disclosure Management**

- Employees are responsible for performing their assigned work, providing services while maintaining the company's sense of belonging and fulfilling the provisions of current or future company regulations. They are obliged to report to the Human Resources Department if they observe any attitude or behavior that is not in accordance with Özgörkey Holding's vision, mission, principles, values and regulations.
- Human Resources is responsible for ensuring that the current Code of Ethics and Code of Conduct Implementation Guide and the HR Regulations are read and understood by employees, documenting the commitment to implement them, and providing training to employees on this subject when necessary. The secretariat work of the Ethics and Disciplinary Board is carried out by the director responsible for the Human Resources department. In addition, the Human Resources department manages the notification and notification process for the decisions taken by the board regarding the employees. When issues related to contractors are on the agenda, it may act with the relevant contract holder or the Purchasing Department.
- Internal Audit is responsible for providing the necessary support and information to the Board on matters related to internal audit. When necessary, it is authorized to audit the activities of the Ethics and Discipline Committee upon the written instruction of the Chairman of the Board of Directors.
- The members of the Ethics and Disciplinary Board are responsible for the confidentiality of the files received by the board, and for overseeing and supervising the execution of the liabilities related to Özgörkey Holding Procedures, Human Resources Regulation and its annexes, legal legislation and the employment contract in accordance with the rules of honesty.
- Legal is responsible for providing the Board with the necessary information and support related to law and legislation, and making legal risks and assessments.

## 5.2. Notification and Classification

- All stakeholders of Özgörkey Holding can report situations or potential violations of the Code of Ethics. You can seek help and support from your direct supervisor or the Ethics and Disciplinary Committee on issues that you do not fully understand or doubt. You can also send a written report to **etikhat@ozgorkeyholding.com**.
- Incoming notifications should be received simultaneously by the members of the Ethics and Disciplinary Committee and securely transmitted in writing to the designated company officers.
- Ethics line responders should try to obtain detailed explanations with evidence from the whistleblower.
- They should categorize whistleblowing issues in line with the content and be in contact with the company responsible for responding, taking action and effectively managing the notifications.
- To enable all relevant stakeholders to make their reports easily and without hesitation, critical ethical reporting issues should be clearly identified. Investigations should be carried out with the awareness that it is much more effective to ensure that reports are received and evaluated in an independent and impartial manner than to set up an internal control system for whistleblowing.
- People who report on ethics are not obliged to identify themselves, but if they disclose their identity information and do not want it to be shared, they should be assured that the information will remain confidential and will not be deciphered in any way.

## 5.3. Reporting

- Incoming reports should be categorized by the Human Resources Department under headings to be specified and reported within established timeframes (e.g., daily reports and weekly reports should be made to authorized Human Resources, Internal Audit, Customer Service managers based on ethical categories specified by the Company).
- Ensure that all communications, documents and reports submitted to the Ethics Line in accordance with PDPL are encrypted and stored in physical and digital environments, taking all information security measures.
- Measures should be taken to provide access to all information and documents stored at a high level of protection for ethical reporting, consistent with current and evolving technologies, and access should be provided by authorized persons.
- It should be ensured that open (pending resolution) or closed (resolved) notifications can be seen in the “Ethics Hotline Tracking Report”.

## 5.4. Assessing Notification

- Incoming reports should be evaluated by the company’s Human Resources, Audit and Customer Service personnel. The results should be reported to senior management.
- The control and coordination of notifications should be carried out by the following units:
  - . Human Resources Employee Relations (unethical behavioral issues)
  - . Internal Audit Units (fraud, abuse and other critical issues)
  - . Customer Service Complaint Management (issues related to customer complaints)

- Employees who are found to have intentionally made unsubstantiated allegations, including ethical claims, may be subject to disciplinary action in accordance with internal procedures.
- Unsubstantiated reports from non-employee stakeholders should be disregarded if they are discovered.
- Senior managers, who are the addressees of the reported threats and risks, can conduct case studies on the reports with the support of internal audit units.
- The results of the review should be communicated by the coordinating unit to the notification owner, and implementation should be carried out on that basis. Notifications to the ethics hotline should then be closed.

### **5.5. Disciplinary Process**

- Senior management may call upon the appropriate Disciplinary Board / Ethics Committee as necessary. Evaluations as a result of the reviews and investigations to be conducted must be documented with supporting documentation.
- The Company may seek outsourced assistance from persons and firms specializing in independent audits and investigations to resolve and substantiate certain critical reports and allegations. The Company may also request the assistance of an expert witness.

### **5.6. Strategy, Control Improvement and Development**

- The evaluation of stakeholder reports, denunciations and allegations may reveal a need to improve and develop the company's internal control system. In this case, action planning is carried out by the parties coordinating the report.
- Project teams can be formed within the company to take action, when necessary.
- In cases where the internal control system is in need of revision, external resource experts and organizations may be consulted.

## **6) DEFINITIONS AND ETHICAL BUSINESS APPROACH**

### **6.1. Code of Ethics**

- The Code of Ethics is a guide containing codes of conduct and standards that show how to behave and make decisions based on an organization's core values.
- Codes of ethics are documents that are shared among an organization's employees and other stakeholders in accordance with established standards and rules.
- Reports of Code of Ethics violations that clearly identify unethical behavior are made through the ethics hotline.

### **6.2. Ethics and Disciplinary Board**

- The Ethics and Disciplinary Board is the most effective and authoritative body in the enforcement and discipline of the Code.
- The Ethics and Disciplinary Board also provides information and advice to employees and other stakeholders on ethical issues and regular ethics training for employees (and other stakeholders).
- The Ethics and Disciplinary Board may initiate an ex officio investigation of an alleged

ethics violation related to its mandate, as well as for reports made to it.

- The Ethics and Disciplinary Board shall take the necessary measures to ensure that persons who report ethical violations or provide information in the course of an investigation are not subjected to interference or retaliation.
- Confidentiality is essential in all investigations conducted by the Ethics and Disciplinary Board. All documents and correspondence reviewed by the Ethics and Disciplinary Board are archived in accordance with the provisions of the Personal Data Protection Law No. 6698 and related legislation.
- People from outside the Ethics and Disciplinary Board may also be invited to Ethics and Disciplinary Board investigations.
- The Ethics and Disciplinary Board shall complete its investigation and submit its final report to the Board of Directors within one month. This period shall run from the date of receipt of the notification. If the Ethics and Disciplinary Board deems it necessary, it may extend this period once up to 3 months.
- The Ethics and Disciplinary Board meets at least once a year, except in cases of ethical violations and investigations.
- The appropriate management and Human Resources Department are responsible for taking appropriate disciplinary action, as permitted by labor law, in accordance with disciplinary rules.

### **6.3. Ethics Hotline**

- In cases where an external stakeholder is harmed by an employee's unethical conduct as a result of a proven error in the internal review mechanism or a legally proven error, the Company agrees to compensate the external stakeholder for the loss.
- The ethics hotline is an important part of corporate and ethical governance, ensuring a wide range of vital company policies, such as the efficient use of resources, brand and reputation.
- It is a mechanism that minimizes losses and fraud within institutions and companies, protects the corporate identity of the company, and makes life easier for employees.
- It is an independent system where employees, suppliers, subcontractors, distributors, and even customers can report unethical behavior, misconduct, and all kinds of nonconformities related to the company. It ensures that companies are protected from all types of losses, including reputational risks.
- Today's organizations are often faced with unethical behaviors such as mobbing, discrimination, etc. and/or misconduct such as theft, embezzlement, forgery, bribery, etc. that negatively impact the work environment and the company's reputation.
- Employees are often unable or uncomfortable reporting problems they know about directly to their managers. Providing employees with an independent mechanism outside of the company through which they can report problems they see and hear about in the work environment without fear of losing their jobs can help to identify these problems earlier and reduce losses.
- The ethical hotline is a professional loss prevention system that operates independently and impartially by consolidating, recording and analyzing complaints and

notifications received via telephone, e-mail, online complaint system, live tip line and mailbox channels.

- Ethics hotlines are the most effective way for employees to report what they know but cannot say or are concerned about. The ethics hotline is an internal control system. It is the only system that combines risk prevention, early detection and deterrence.
- All incoming notifications are classified in a specific format and periodically submitted as a report to the authorized bodies designated by the Company. On the basis of the reports submitted to the Company, improvements are made on the points open for improvement after review by the Company.

#### **6.4. Mobbing**

- These are negative actions that are repeatedly applied to employees in the workplace, with the goal of creating situations such as psychological pressure, intimidation, or termination; that harm people's professional status, personal values, or health; that have malicious intent; and that are deliberate.

#### **6.5. Examples of Ethics Hotline Reporting Issues**

##### **- Issues Concerning Human Resources**

##### **1. Unethical Behavioral Issues**

- 1.1. Conflict or disagreement
- 1.2. Insulting
- 1.3. Mocking or insulting behavior
- 1.4. Gossiping
- 1.5. Lying
- 1.6. Defamation
- 1.7. Discrimination
- 1.8. Favoritism (showing nepotism)
- 1.9. Emotional affair disrupting the work environment
- 1.10. Keeping silent or ignoring inappropriate behavior
- 1.11. Exchange of money between superior and subordinate
- 1.12. Political propaganda, etc.
- 1.13. Psychological harassment (mobbing)
- 1.14. Sexual harassment
- 1.15. Threats or blackmail
- 1.16. Physical violence or fighting
- 1.17. Substance or alcohol abuse
- 1.18. Unjustified dismissal
- 1.19. Unfair practice related to work organization
- 1.20. Other unethical behavior issues

##### **- Issues Concerning Audit Units**

##### **2. Fraud and Other Critical Issues**

- 2.1. Abuse of trust (abuse of security)
- 2.2. Use of company resources for personal interests

- 2.3. Embezzlement of company funds
- 2.4. Wasting company resources
- 2.5. Internal theft
- 2.6. Outside theft
- 2.7. Cheating, dishonesty, and fraud
- 2.8. Personal interest relationship with the supplier
- 2.9. Bid rigging
- 2.10. Debt exchange with suppliers
- 2.11. Acceptance of luxury gifts etc., from suppliers
- 2.12. Bribery
- 2.13. Violation of company rules
- 2.14. Violation of information security, such as information leakage, etc.
- 2.15. Violation of the application of the law on the protection of personal data
- 2.16. Violation that brings the company into legal trouble
- 2.17. Violation that endangers occupational health and safety
- 2.18. Violation that threatens the safety of life and property
- 2.19. Violation of brand and reputation
- 2.20. Other critical risk issues

### **- Issues Concerning Customer Service**

#### **3. Complaint Issues Regarding Unethical Behavior**

- 3.1. Uncorporate, disrespectful language, such as rude, vulgar, etc.
- 3.2. Lack of customer service
- 3.3. Lack of information about the product or service
- 3.4. Employees arguing with customers
- 3.5. Failure to provide information about or respond to the complaint notification
- 3.6. Insulting
- 3.7. Mockery or offensive treatment
- 3.8. Lying
- 3.9. Defamation
- 3.10. Sexual harassment
- 3.11. Threats or extortion
- 3.12. Physical violence or fighting
- 3.13. Other unethical behavior



**Do not hesitate to contact us** if you encounter a situation that you believe may violate our ethical values or the law.

**We are ready to listen to you** and assist you in finding the right solution, while **respecting the principles of confidentiality.**



You can send a written report to [etikhat@ozgorkeyholding.com](mailto:etikhat@ozgorkeyholding.com)



You can call extension 304



You can report 24 hours a day, 7 days a week



Reports to the ethics hotline are handled by the Ethics Committee in an independent and impartial manner

