ETHICAL CONDUCT POLICY

PURPOSE: This policy is based on the adoption of the principles of integrity, transparency, accountability, fairness, compliance with laws and ethical business practices in all activities of Öztiryakiler. Our Company aims to prevent, detect and effectively manage bribery, corruption, fraud, conflicts of interest, money laundering and other forms of unethical conduct.

SCOPE: This policy covers members of the Board of Directors, managers, employees, interns, consultants, suppliers, contractors, distributors, dealers and all natural and legal persons acting on behalf of Öztiryakiler.

RESPONSIBLE DEPARTMENTS: Ethics Committee, All Departments.

METHOD:

1. GENERAL RULES

1.1. Definition

The components of Oztiryakiler Ethical conduct system are as follows;

Ethical Conduct; refers to the compliance of a conduct with the principles of ethical conduct of Oztiryakiler's business, relevant legislation and other local, national and international regulations (permits, licenses, rules or guidelines established by regulatory bodies, agreements, contracts and protocols), relevant corporate policies and documents, moral and cultural values.

Compliance Handbook; is a document prepared to establish the corporate framework for ethical conduct.

Ethical Conduct Program; covers all of the studies created to ensure the continuity and continuous improvement of the ethical conduct performance in order to ensure ethical compliance in the activities of Oztiryakiler.

Bribery: Offering, giving, requesting or accepting a benefit, directly or indirectly, with the aim of influencing a business decision or process.

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Corruption: The misuse of authority or position for personal gain.

Fraud: Acts of deception, misrepresentation, forgery, falsification of records or concealment of information committed to obtain an unfair or unlawful benefit.

Conflict of Interest: A situation in which an employee's personal interests affect or may affect the interests of the company or the employee's ability to make objective decisions.

Money Laundering: Activities intended to make proceeds obtained from illegal sources appear to have been obtained through lawful means.

1.2. Ethical Conduct Goal

The goal of Oztiryakiler's ethical conduct system;

1.2.1. A system has been established to establish, develop, implement, evaluate, maintain and improve compliance in ethical conduct activities.
1.2.2. Ethical conduct activities are constantly encouraged in line with the strategic direction of the organization.
1.2.3. All necessary resources are allocated for the correct understanding and implementation of ethical conduct by all Employees.
1.2.4. It has been ensured that the monitoring and evaluation of the effective implementation of ethical conduct are made objectively.
1.2.5. When a violation is detected in the Ethical Conduct System, the necessary corrections and corrective actions are implemented in accordance with pre-determined procedures without delay to protect the brand value.
1.2.6. Öztiryakiler adopts a zero-tolerance approach to bribery, corruption, fraud, conflicts of interest, money laundering and other unethical practices.
1.2.7. All employees are encouraged to participate in regular ethics training to raise ethical awareness.
1.2.8. A safe and confidential environment is ensured for reporting ethical concerns without fear of retaliation.

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1.2.9. Öztiryakiler encourages its employees to receive regular training on ethical conduct, anti-bribery and anti-corruption, fraud prevention, conflicts of interest and information security, and aims to expand the reach of such training.

1.3. Basic Responsibilities

1.3.1. Management's Responsibility

a) To perform ethical conduct activities effectively and to encourage Employees to comply with code of ethics,

b) To comply with policies, regulations, procedures and processes personally and to show compliance with them, to participate in and support ethical conduct training activities,

c) Actively undertaking mentoring, coaching and supervision to encourage employees,

d) To encourage employees to express their ethical conduct concerns,

e) Actively participating in the management and resolution of events and problems related to ethical conduct,

f) To increase the awareness of employees about ethical conduct obligations,

g) To integrate ethical conduct performance into employee performance evaluations.

h) To ensure that the necessary control mechanisms are established and maintained to prevent ethical violations,

İ) To monitor and assess risks related to bribery, corruption, fraud and conflicts of interest,

j) To ensure the protection of employees who report concerns.

1.3.2. Responsibility of Employees;

All Employees including Managers are obliged to;

a) Comply with the rules regarding ethical conduct,

b) Participate in scheduled trainings on code of ethics,

c) Use company resources in accordance with the code of ethics,

d) Inform the relevant unit immediately when there is a violation or suspected violation of the code of ethics.

e) To refrain from engaging in bribery, corruption, fraud, conflicts of interest and money laundering,

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f) To promptly report potential conflicts of interest to their manager or the Ethics Committee,
g) To maintain the accuracy of company records,
h) To use company assets solely for business purposes,
i) To protect confidential information and refrain from sharing it with unauthorized persons,
j) To refrain from creating false records, documents or reports and from participating in forgery or fraudulent activities,
k) To respect the confidentiality of reports of ethical violations made in good faith and refrain from any retaliatory conduct against persons making such reports.

1.4 ETHICAL CONDUCT PRINCIPLES

1.4.1. Integrity, Transparency and Compliance with Laws

Öztiryakiler conducts all its activities in accordance with the principles of integrity, transparency, accountability, fairness and compliance with laws.

All employees are required to:
a) Comply with applicable laws and regulations in the countries where the Company operates, as well as company policies and procedures,
b) Prepare accurate, complete, timely and truthful records, documents and reports relating to company activities,
c) Act in a manner that protects the Company's reputation,
d) Refrain from conduct that violates ethical principles.

1.4.2. Anti-Bribery and Anti-Corruption

Öztiryakiler adopts a zero-tolerance approach to all forms of bribery and corruption in every country where it operates.

No employee may:
a) Directly or indirectly offer, give or promise money, commissions, payments, hospitality or any other benefit with the aim of influencing a business decision,

b) Request or accept such benefits,
c) Provide improper benefits in dealings with public institutions, customers, suppliers, contractors or other business partners,
d) Facilitate or participate in facilitation payments.

All employees are required to comply with the provisions of the Anti-Bribery, Anti-Corruption and Anti-Fraud Policy.

1.4.3. Prevention of Fraud and Misconduct
Öztiryakiler adopts a zero-tolerance approach to fraud, forgery, embezzlement, irregularities and all other forms of misconduct.

The following conduct is considered an ethical violation:
a) Creating false documents, records or reports,
b) Submitting false statements of expenditure, expenses or performance,
c) Altering, concealing or falsifying financial or operational records,
d) Using company assets, equipment or resources for personal gain,
e) Obtaining an unfair advantage by concealing information or making misleading statements,
f) Embezzling or misusing company resources.

Employees are required to report suspicious circumstances to the Ethics Committee without delay.

1.4.4. Prevention of Conflicts of Interest
Employees perform their duties in accordance with the principles of impartiality, independence and safeguarding the Company's interests.

The following situations may be considered conflicts of interest:
a) An employee or their close relations having a financial or commercial interest in entities that have a business relationship with the Company,
b) Providing an unfair advantage to family members, close relatives or persons with whom the employee has a personal relationship,

c) Using company resources, assets or business opportunities for personal gain,
d) Personal interests influencing decisions made on behalf of the Company,
e) Using information and authority acquired through their duties for personal gain.

Employees are required to report actual or potential conflicts of interest to their managers and the Ethics Committee.

1.4.5. Prevention of Money Laundering and Terrorist Financing

Öztiryakiler undertakes to comply with national and international legislation aimed at combating money laundering and terrorist financing.

Employees:
a) Must not participate in financial transactions whose source is unclear or which are suspicious,
b) Must not engage in activities aimed at legitimizing proceeds obtained from illegal sources,
c) Are required to report suspicious transactions or activities immediately to their managers and the Ethics Committee,
d) Act in a manner that ensures the accuracy and traceability of financial transactions.

1.4.6. Gifts, Hospitality and Benefits

Employees must comply with the provisions of the Instruction on Giving and Receiving Gifts and Hospitality.

No employee may:
a) Accept gifts or benefits that could influence business decisions,
b) Accept or give cash or cash-equivalent gifts,
c) Enter into hospitality or benefit arrangements that could create a sense of obligation on the part of the other party.
d) Gifts and hospitality must be reasonable, transparent and compliant with applicable legislation.

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1.4.7. Protection of Confidential Information

Employees are required to maintain the confidentiality of commercial, financial, technical, personal and strategic information obtained in the course of their duties.

Within this scope, employees:
a) Must not share confidential information with unauthorized persons
b) Must not use confidential information for personal gain,
c) Are required to protect company secrets.
d) This obligation continues after the termination of the employment relationship.

1.4.8. Protection of Company Assets

Employees are responsible for protecting company assets, equipment, information systems, financial resources and intellectual property rights.

Company resources may only be used for business purposes and must not, under any circumstances, be used for personal gain.

1.4.9. Fair Competition and Honest Business Practices

Öztiryakiler conducts its activities in accordance with applicable competition legislation. Employees must not engage in activities that prevent, distort or restrict competition; they must not participate in practices such as price-fixing, market-sharing or the sharing of commercially sensitive information with competitors. The principles of honesty, impartiality and fair competition form the basis of all business relationships.

1.4.10. Reporting, Whistleblowing and Prevention of Retaliation

Employees are required to report any suspicions of bribery, corruption, fraud, conflicts of interest, money laundering or other ethical violations to the Ethics Committee without delay.

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Employees who make reports in good faith must not be subjected to:
a) Discrimination
b) Threats
c) Pressure
d) Mobbing
e) Dismissal
f) Adverse treatment in relation to their career or performance.,

All reports are assessed in accordance with the principles of confidentiality, impartiality and fairness.

2. ETHICAL CONDUCT SYSTEM

Employees who report ethical violations in good faith must not be subjected to discrimination, threats, pressure, workplace bullying or retaliation. All reports are assessed in accordance with the principles of confidentiality and impartiality.

2.1. Oztiryakiler Board of Directors

Determines the general framework rules regarding the ethical conduct system.

2.2. Ethics Committee

Ethics Committee consists of the Legal Advisor, Corporate Risk Management and Compliance Coordinator, Human Resources Manager, Internal Audit Manager, Corporate Risk Management and Compliance Manager and Quality Management Manager (Social Compliance Representative). Depending on the subject of ethical reporting, the relevant Department Manager can also take place in the Ethics Committee when necessary. The Ethics Committee controls the implementation of the code of ethics.

Violations reported to the Ethics Committee are evaluated, and any identified violations are referred to the Disciplinary Committee if necessary. Violations of ethical conduct are also reported in accordance with J-Sox ELC regulations.
The Ethics Committee ensures the assessment of ethical risks, the review of reports of ethical violations, the conduct of necessary investigations and the follow-up of improvement activities.

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Ethics Committee carries out its activities in accordance with the Duties and Working Principles of the Ethics Committee.

Disciplinary Board
It makes the necessary decisions regarding unethical conduct reported by the Ethics Committee.

The Disciplinary Board carries out its activities in accordance with the Duties and Working Principles of the Disciplinary Board.

3. ETHICAL CONDUCT INCENTIVES

3.1. Ethical Conduct Incentive System

In order to encourage the implementation of code of ethics in Oztiryakiler;
Ethics Hotline has been established in order for the Employees to inform in case of suspicion of violation in the activities carried out, and functions related to auditing the reported violation.

Ethical concerns reported by employees are assessed in accordance with the principles of confidentiality, impartiality and protection from retaliation.

3.2. Compliance Handbook

The Ethics Committee edits the Compliance **Handbook**, organizes the necessary awareness-raising and training activities for its implementation, periodically reviews it and makes updates when necessary.

Information on the ethics hotline were communicated to all Employees.

3.3. Ethical Conduct Program and Its Dissemination for the Organization

Periodic training sessions are organized as part of ethical conduct programs on combating bribery and corruption, fraud, conflicts of interest, money laundering, information security and ethical decision-making.

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Ethics Committee prepares ethical conduct programs within Oztiryakiler and submits them to the approval of CEO/MD.

Ethics Committee cooperates with all units for the implementation of the ethical conduct program.

4. Policy Review

This policy is regularly reviewed in line with relevant legal regulations, national and international standards, stakeholder expectations and company needs, and is updated when necessary.

Öztiryakiler undertakes to regularly monitor, measure and continuously improve its ethical conduct performance. Within this scope, ethical risks, reported ethical incidents, training activities, corrective actions and compliance processes are periodically assessed. Necessary improvement measures are planned and implemented based on the assessment results.

Chairman of the Board of Director

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