

PURPOSE: This policy aims to establish a framework for activities related to Oztiryakiler Ethical conduct system and the correct and effective use of practitioners.

SCOPE: This policy covers Oztiryakiler's Board Members and all employees.

RESPONSIBLE DEPARTMENTS: Board Members, All Employees.

METHOD:

1. GENERAL RULES

1.1. Definition

The components of Oztiryakiler Ethical conduct system are as follows;

a. Ethical Conduct; 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.

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

c. Ethical Conduct Program; The 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.

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.

1.3.Basic Responsibility of All Group Members

1.3.1. Management's Responsibility

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

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- 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.

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.

2. ETHICAL CONDUCT SYSTEM

The committees in the ethical conduct system are;

2.1. Oztiryakiler Board of Directors

Determines the general framework rules regarding the ethical conduct system.

2.2. Ethics Committee

The Ethics Committee was appointed by the Board of Directors. Ethics Committee consists of the Legal Advisor, Corporate Risks Management and Compliance Coordinator, Human Resources Manager, Internal Audit Manager, Internal Control and Compliance Manager and Quality Management Manager (Social Compliance Representative). Depending on the subject of ethical reporting, the relevant Unit 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 detected violations are reported to the Disciplinary Board. Ethical conduct violations are also presented to the Board of Directors meetings.

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

2.3. Disciplinary Board

It makes the necessary decisions regarding unethical conduct reported by the Ethics Committee. It reports the violations reported to the Disciplinary Board and the decisions taken by the Disciplinary Board and notifies the Board of Directors.

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

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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.

3.2. Compliance Manual

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

Contact information of the Ethics Committee members and information on the ethics hotline were communicated to all Employees.

3.3. Ethical Conduct Program and Its Dissemination for the Organization

Ethics Committee prepares ethical conduct programs within Oztiryakiler and submits them to the approval of the Board of Directors.

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

4. MISCELLANEOUS

4.1. Revision

This policy is constantly reviewed and updated by the Ethics Committee, and revision requests are made with the approval of the Board of Directors.

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