öztiryakiler

COMPLIANCE HANDBOOK

"Together,
doing what's right."

Message from Our Chairman of the Board



Dear Öztiryakiler Employees;

It is the responsibility of all our Employees to;

- Carry out our activities with the awareness of “Respect, Love, Loyalty, Sincerity, Responsibility” to our employees, customers, suppliers, dealers, authorized services, laws and shareholders,
- Understand the needs and expectations of the relevant parties correctly at the first time, on time, quickly and in accordance with national and international standards,
- Desire to produce the initials and innovations,
- Develop kitchen projects that are preferred in global markets.

Comply with the environment, legal regulations, occupational health and safety, human rights and international standards, ESG principles and global ethical values while performing our activities, which are our basic values constituting the sustainability of our Industrial Kitchen story started in 1958.

I invite you to work together to sustain our business continuity in line with our corporate philosophy and Code of Ethics as we pursue our Company goals.

Chairman of the Board
Yusuf Kenan ÖZTİRYAKİ

Contents

- **Message from Our Chairman of the Board**
- **Introduction/Preface** 4
- **Our Corporate Values** 5
  - Our Vision
  - Our Mission
  - Management Philosophy
- **The Hoshizaki Group Corporate Philosophy** 6
- **About the Code of Ethics** 7
  - What is Ethical Conduct?
  - Business Ethics
  - Relationship Between Ethics / Morality / Law
  - Why Is Code of Ethics Necessary? 8
  - Öztiryakiler Ethical Conduct System
- **Ethics Hotline** 9
- **Öztiryakiler Ethics / Compliance / Risk Management Organization** 11
- **Ethical Conduct Principles** 12
- **Chapter 1 – Realizing a Healthy Workplace Environment** 13
- **Chapter 2 – Honest Conduct and Diligent Performance**
- **Chapter 3 – Respect for Human Rights** 14
- **Chapter 4 – Environmental Consideration** 15
- **Chapter 5 – Engagement with Local Communities** 16
- **Chapter 6 – Risk Management**
- **Chapter 7 – Response to Organized Crime Groups** 17
- **Chapter 8 – Prevention of Bribery**
- **Chapter 9 – Antitrust Law/Competition Law** 18
- **Chapter 10 – Points to Note in Sales and Service Activities** 19
- **Chapter 11 – Points to Note in Procurement Activities**
- **Chapter 12 – Quality** 20
- **Chapter 13 – Proper Protection and Utilization of Intellectual Property** 21
- **Chapter 14 –** Protection of Company Assets and Separation of Business and Personal Affairs / Prohibition of Conflicts of Interest 22
- **Chapter 15 – Information Security, Confidentiality Management, and Personal Information Protection** 23
- **Chapter 16 – Export Control** 24
- **Chapter 17 – Proper Financial Reporting and Fulfillment of Tax Obligations** 25
- **Chapter 18 – Disclosure of Company Information and Prevention of Insider Trading** 26

Introduction/Preface

This Compliance Handbook describes the principles, policies and processes regarding the Öztiryakiler “Code of Ethics”. Öztiryakiler management conducts an Ethics Management Program to communicate its commitment to ethics, honesty and company values to its Employees and stakeholders. Responsibility for the implementation of this program belongs to the Ethics Committee appointed by the Board of Directors. The Ethics Committee coordinates the follow-up and management of the process by providing training and information to Öztiryakiler Employees on the application of the Code of Ethics. These codes are defined in the Compliance Handbook, and it is expected that the Ethics Committee will be consulted regarding any issues not included in this Compliance Handbook. All Employees, including the Board Members, have the responsibility to ask questions, seek guidance, report suspected breaches and exchange opinions on ethical conduct. It is the commitment of management that no retaliation will be allowed against any Employee or external party who communicates opinions or concerns regarding breaches of the practices implemented within the scope of the Ethics Management Program or reports any suspected breach.

It is the responsibility of all Öztiryakiler Employees to read this Compliance Handbook carefully and comply with its provisions. In case of any unclear situation, details regarding requests for information on Ethics are described in the “Ethics Hotline” section..

SINCE 1958

öztiryakiler

Our Corporate Values

Our Vision

''To be a customer-oriented, human and environmentally sensitive technological, quality and innovative leader brand in the industrial kitchen sector''

Our Mission

With all our Employees;

- To meet customer expectations at the maximum level
- To ensure continuity in quality and service.
- To provide continuous added value to society and the environment.

Management Philosophy

- To ensure that our company is trusted by employees and society, with the principle of following the laws sensitively.
- To create and maintain a transparent and traceable management model
- To provide a healthy and safe working environment sensitive to people and the environment

Chairman of the Board
Yusuf Kenan ÖZTİRYAKİ

The Hoshizaki Group Corporate Philosophy

Purpose

It states why the Hoshizaki Group exists and how it should contribute to society.

We, Hoshizaki Group, aim to be an “Evolving Company” contributing to society as well as customers, meeting the changing needs and demands for diversified “Eating.”

To achieve the above, we develop original products incorporating original technology. And we present innovative proposals for a more comfortable and efficient eating environment and offer responsive, high quality services.

Management Philosophy

Promise of the Company that the management makes and the employees bring to life.

Dedicated:
To compliance with the laws, and to making the Company trusted by society and its employees.

To practicing a management with transparency and discussion.

To realizing harmonization of business activities with the environment, and a good environment to work.

“Good products comes from a good environment.”

Hoshizaki-ism

Action guidelines for all Group employees that support the Purpose and Management philosophy

Dream
Have a dream to begin with. Results are sure to follow.

A profitable company has a culture that generates profit
Do things differently from others.
See a “profitable” state as the norm.

Change is the only way to evolve
Staying ‘as is’ brings you down.

Do not use Money to make Money
We make money from what we produce and sell.

Broaden your horizons
Something that seems wasteful could help you later on.

About the Code of Ethics

01 What is Ethical Conduct?

Ethics consists of values and virtues that guide a person to make correct decisions and act in the right way. Decisions taken by all stakeholders and behaviors in daily activities, both inside and outside the company, must comply with ethical criteria.

Ethical Conduct refers to the compliance of a conduct with the principles of ethical conduct of Öztiryakiler'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.

02 Business Ethics

Business ethics defines the correct approach and conduct of managers, employees and companies. It is aimed to ensure that managers and employees show high standards of conduct, are aware of the corporate effects of their conduct and attitudes, use the right methods and show qualified attitudes.

Company policies and approaches are well defined, with the awareness that the effects and consequences of ethical decisions in business life will be great and long-term. It is important to train employees, ensure effective compliance with business processes and implement them.

03 Relationship Between Ethics / Morality / Law



What is Compliance?

Compliance in Öztiryakiler means to meet moral values and social expectations and to comply with the legislation and the internal rules determined by the Company.

About the Code of Ethics

04 Why Is Code of Ethics Necessary?

Code of Ethics;

To secure our corporate business continuity.

Our company has considered the Code of Ethics as an integral part of business life throughout its existence. It shall continue to secure its future by maintaining this compliance.

To ensure the continuity of our credibility in our business and social environment.

We believe that all institutions and organizations that have business relations with Öztiryakiler follow our code of ethics in all circumstances. This has enabled us to be regarded as a transparent, reliable and fair organization in all our business activities.

To provide a safe working environment for our employees.

It is ensured that our employees feel themselves in a safer environment by clearly determining our code of ethics and by continuously improving their competencies in line with their duties, authorities and responsibilities.

To ensure more efficient use of our resources with preventive actions.

It contributes to the determination of preventive actions against risks in the planning stages of our activities with our effective risk identification and information security system regarding our goals and business programs.

05 Öztiryakiler Ethical Conduct System

Our most important strength is the executive support, participation, belief in and leadership of our Board of Directors in determining, implementing and developing our Ethical Conduct system. Öztiryakiler Ethical Conduct System has been established in accordance with the principles of planning, implementation, control and continuous improvement.

The Ethics Committee has been appointed by Öztiryakiler Board of Directors to be responsible for the coordination of all stages of our ethical conduct system.

Ethics Hotline

Öztiryakiler has established the Ethics Hotline for the effective and impartial management of the Ethical Conduct, Information Security and Risk Management system, the details of which are described below.

TOPIC	CONTENTS
Purpose	Within the scope of Öztiryakiler Compliance Handbook, the Ethics Hotline has been established to report any suspicion or hesitation regarding any non-conformity, unethical practice or violation of the laws and regulations that the company is subject to
Scope	"Code of Ethics" covers all managers of the Company, the Board Members, and all office and manufacturing employees, and all of them shall be referred to as the "Employee(s)" in in this Compliance Handbook.
Who Can Use	Öztiryakiler Board Members and Employees
Subjects to be notified;	• Violations of the rules in Compliance Handbook, • Violations and abuses of law and legislation, • Conduct contrary to our corporate policies and procedures, • Notifications of potential risks.
Where to Consult and Provide Information	**Ethics Hotline** Ethics Committee OZTIRYAKILER MADENI ESYA SAN.VE TIC.A.S. Cumhuriyet Mahallesi Hadimkoy Yolu Caddesi No:8 Buyukcekmece-ISTANBUL-TURKEY Phone / Whatsapp Line: +90 537 523 83 83 E-Mail: etikkurulu@oztiryakiler.com.tr Ethics Notification Box
Information Environment	Phone/Whatsapp Line, E-mail, Mail, Ethics Notification Box
Process Flow	1. Informant: Who provides information 2. Recipient: Receiving and saving information 3. Ethics Committee; Research, control and verification 4. Ethics Committee; Reporting and correction/corrective action 5. Informed: Informing person(s) providing information
Basic Rules for Consultation and Information	1. The informant shall not be subjected to retaliation in any way for the information s/he has provided/consulted. 2. Confidential information belonging to the informants shall always be protected, information on the informant and the information s/he provided may only be shared with authorized persons only to the authorized persons. 3. If the name of the informant is unknown, the notification shall be considered anonymous. 4. The results shall be communicated to the informant
Record Keeping	Information on the subject, researches, evaluations and details of the findings shall be recorded by the Ethics Committee.

Ethics Hotline

If the employees learn that the Code of Ethics or the legal regulations governing the Company has been violated ("Violation"), they should report the violation to (i) Ethics Hotline and/or (ii) the managers to whom they directly report.

If the violation involves the employee's direct supervisor, the employee must report it to (i) the Ethics Hotline and/or the Human Resources Manager.

If the violation is related to Senior Management, the violation should be reported directly to the Ethics Hotline. Notifications can be made anonymously, but our corporate preference is to make notifications containing contact information. We can provide feedback to those who provide information in this way about the decision of the Ethics Committee.

Your notifications are valuable to us, thank you for your support.

Handling Notification;

All notifications shall be evaluated by the Ethics Committee without delay in line with the principles of;
- Confidentiality
- Transparency
- Honesty
- Accountability.

The decision taken as a result of the evaluation shall be applied. The notifier shall be informed about the result of the notification.

It is unacceptable to retaliate against the person who reports violation of ethics and all persons participating in the investigation.

Notifications, evaluation of the notification and the activities carried out shall be recorded as defined in the Principles on Duties and Working Principles of Ethics Committee.

It is essential that notifications regarding ethical rules be made on the basis of good faith. It is unacceptable to intentionally make false, misleading or malicious notifications. In the event that it is determined that the Compliance Handbook, company policies and procedures, and the provisions of the legislation in force have been violated, disciplinary processes may be initiated against the relevant employee, taking into account the nature and severity of the violation; disciplinary sanctions such as warning or reprimand may be imposed; and, if deemed necessary, the employment contract may be terminated immediately for just cause or with notice pursuant to the provisions of the Labor Law. In addition, if the violation gives rise to legal, administrative or criminal liability or causes damage to the company, the relevant legal processes may be initiated and compensation for the damage may be requested.

Organizational Structure for Enhancing Compliance

ÖZTİRYAKİLER
Board of Directors

CEO / MD

Hoshizaki Chief Compliance/Risk Manager

Ethics and Compliance Manager

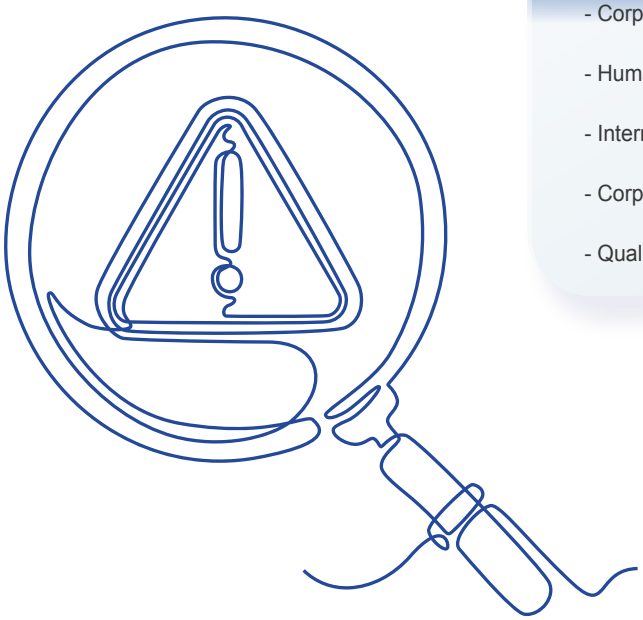
Risk Management Committee

Disciplinary Board

Ethics Hotline

ETHICS COMMITTEE

- Chief Legal Officer
- Corporate Risk Management and Compliance Coordinator
- Human Resources Manager
- Internal Audit Manager
- Corporate Risk Management and Compliance Manager
- Quality Management Manager (Social Compliance Representative)



Relevant Unit Managers (When Required)

Ethical Conduct Principles

Öztiryakiler's Board of Directors and all Employees,

1. Serve with this ethical awareness in the countries where our company, operating in the industrial kitchen sector, operates with the ethical conduct system and practices established with the awareness of "Respect, Love, Loyalty, Sincerity and Responsibility",

2. Gain the trust of all our stakeholders by establishing and implementing a system in a transparent and accountable manner for all our activities,

3. Exhibit behaviors that demonstrate that we are an ethical, reliable and responsible company that respects current legislation, ethical, social and cultural values in the countries in which we operate,

4. Work to contribute to sustainable development, including the health and wellbeing of the society, with the awareness of a good world citizen by offering products and services that are sensitive to the environment and make life easier for users,

5. Do not support any formation wishing to change the country and the world order in non-democratic ways by paying regard the Social, Ethical and Legal criteria in every condition, location and time.

01 Realizing a Healthy Workplace Environment

As Öztiryakiler, we believe that our employees are our most valuable corporate resource. We aim to create a working environment in which all employees feel safe, valued, respected and with a sense of belonging. We support the creation of a sustainable working culture in line with the principles of occupational health and safety, equal opportunities, professional development, mutual respect and employee welfare.

Key Points for Action

- We act in accordance with the legislation in force regarding work and employment, employment contracts, and company policies and procedures.
- We support a culture of mutual respect, cooperation and open communication among our employees.
- We encourage training and development activities so that each employee can develop his/her knowledge, skills and competencies.
- We take the principle of equal opportunity as basis in recruitment, career development, performance evaluation and remuneration processes.
- We act in accordance with occupational health and safety rules and take the necessary measures to ensure safe and healthy working conditions.
- We encourage the timely reporting of occupational accidents, near-miss incidents, safety risks or nonconformities regarding the working environment.
- We attach importance to practices that support our employees' work and private life balance.

02 Honest Conduct and Diligent Performance

As Öztiryakiler employees, we perform our duties with an understanding of honesty, responsibility and professionalism. In our business relations, we take as basis being reliable, keeping our promises,fulfilling our commitments, and carrying out our activities in accordance with the legislation in force, company policies and ethical principles.

Key Points for Action

- While performing our duties, we act with common sense, attention and care; we engage in conduct that will protect our company's reputation.
- Before making a commitment on behalf of the company, we evaluate all relevant conditions, obtain the necessary opinions and approvals, and make only those commitments that we believe can be fulfilled.
- We act in accordance with the promises, deadlines and commitments we have given to our customers, suppliers and other stakeholders.
- We share delays and disruptions that may arise in business processes with the relevant parties in a timely manner and contribute to the taking of corrective actions by providing the necessary information.
- We perform our duties with a sense of responsibility; in reporting, communication and consultation processes, we provide accurate, complete and timely information.
- We do not make misleading statements, conceal information or distort facts in order to obtain personal or corporate benefits.

03 Respect for Human Rights

As Öztiryakiler, we regard respect for human rights as one of the fundamental elements of our corporate culture and way of doing business. We take as basis that our employees, customers, suppliers, business partners and all stakeholders are treated fairly, respectfully and with dignity; and we aim to create a safe, inclusive working environment based on mutual respect.

Key Points for Action

- We act in accordance with national and international regulations regarding human rights; we do not tolerate discrimination, violence, harassment, forced labor, child labor or any practice incompatible with human dignity.
- We do not allow discrimination on the grounds of race, ethnic origin, nationality, religion, belief, language, gender, sexual orientation, age, disability status, marital status or any reason protected by legislation.
- We take the principle of equal opportunity as basis in recruitment, remuneration, promotion, training, performance evaluation and other human resources processes.
- We do not tolerate any form of physical, psychological, verbal or sexual harassment or violence.
- We aim to create a working environment in which our employees feel safe, valued and respected.
- We do not allow any form of forced labor, child labor, human trafficking or modern slavery.
- We expect our stakeholders also to act with respect for human rights and in accordance with ethical principles.
- In social, environmental and governance standards and practices, we take as basis the United Nations Global Compact, the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.
- We report without delay behaviors or practices considered to be contrary to human rights to the relevant managers, the Human Resources Department, the Legal Department or the Ethics Hotline.

04 Environmental Consideration

We act with awareness of the impacts of our activities on the environment; we consider the protection of natural resources, sustainable production and leaving a livable environment to future generations among our fundamental responsibilities. In our production processes, we undertake to ensure full compliance with environmental legislation, to use energy and natural resources efficiently, to reduce waste and to benefit from renewable energy sources. With our Solar Power Plant (SPP) investments and other practices, we support reducing our carbon footprint; and we aim to create a sustainable working culture in which all our employees act with environmental awareness.

Key Points for Action

- We act economically and efficiently in the use of energy, water and raw materials.
- We reduce waste generation and support recycling and reuse practices.
- We work in accordance with environmental legislation, company procedures and sustainability standards.
- We apply methods that will reduce environmental impacts in production processes.
- We support and expand Solar Power Plant (SPP) and other renewable energy practices.
- We develop projects aimed at reducing our water footprint.
- We develop projects aimed at reducing our carbon footprint.
- We ensure the safe use and disposal of chemical and hazardous substances.
- We identify in advance the risks that may harm the environment and take the necessary measures.
- We support the development of our employees regarding environmental awareness and provide training and awareness activities.
- We expect all our employees to actively participate in environmental protection practices.
- We encourage the use of environmentally friendly technologies.
- We expect all our stakeholders to act with environmental responsibility awareness.
- We give priority to practices that support the protection of biodiversity. While carrying out all kinds of our activities, we avoid activities that may harm natural habitats, plant and animal species and act in accordance with environmental sustainability principles.
- In all our activities, we aim to reduce our environmental impact and act in accordance with the Hoshizaki Group Sustainability Principles published on our website.

05 Engagement with Local Communities

We undertake to establish relations with local communities in the regions where we operate based on mutual trust, respect and sustainable cooperation. In addition to the economic contribution of our production activities, we are also aware of their social and environmental impacts. In this regard, we take into consideration the opinions of local stakeholders, establish transparent communication and support projects that will contribute to social development. We aim not only to be a manufacturing company, but also to be a company that creates value and leaves a positive mark in the regions where we are located.

Key Points for Action

- We establish open, regular and transparent communication with local communities; we create feedback mechanisms.
- We apply production processes that will minimize environmental impacts and remain committed to sustainability principles.
- We provide educational support to students, strengthen equal opportunity and contribute to social development.
- We carry out donation, grant, social responsibility, volunteering projects and sponsorship activities transparently and effectively within the framework of internal company policies.
- We support local employment and suppliers and contribute to regional development.
- We act with respect for local culture, values and sensitivities.

06 Risk Management

We foresee and appropriately identify the risks relating to our company activities and, in the event that the risks materialize, we make preparations to minimize human losses, company damages and disadvantages.

We adopt risk management not merely as intervening in existing problems, but as a continuous development process that addresses possible risks with preventive approaches.

Key Points for Action

- We ensure that all our employees act with risk awareness. Any risk identified within an employee's area of responsibility must not be ignored and must be reported to their manager or the relevant departments and, where necessary, to the Corporate Risk and Compliance Coordination Office in accordance with the "Risk Management Procedure".
- In our decisions, we take into account ethical principles, legal obligations and corporate values.
- For identified risks, we evaluate and implement prevention, avoidance, reduction, transfer and other necessary measures.
- In the event of an accident or disaster, we give priority to human life in the first response. Pursuant to laws and internal policies, we immediately notify the relevant authorities, departments and stakeholders and take appropriate measures.

07 Response to Organized Crime Groups

We do not establish any relationship in any way with persons, groups and formations that constitute a crime, harm society or threaten public order. We do not enter into a business relationship with such parties under any circumstances, even if it would provide any commercial advantage.

Key Points for Action

- We do not establish any direct or indirect commercial relationship with organized crime groups and do not provide support to these structures in any way whatsoever.
- When new business relationships are established, we evaluate, to the necessary extent, that customers, suppliers, dealers, business partners and other third parties are not connected with unlawful formations.
- We definitively reject all kinds of pressure, requests for benefits or improper directions coming from organized crime groups.
- We report suspicious situations or nonconformities without delay to the Ethics Hotline, the Legal Department or the relevant managers.



08 Prevention of Bribery

We do not directly or indirectly provide any benefit to public officials or private sector representatives for the purpose of obtaining business, gaining advantage, influencing the process or gaining influence. In all countries where we operate, we adopt a zero-tolerance approach against bribery, corruption and similar unlawful practices and conduct all business activities in line with the principles of honesty, transparency and accountability.

Key Points for Action

- We do not provide money, gifts, hospitality, donations or any similar benefit to public officials, customers, suppliers, business partners or persons in a similar position for the purpose of providing an improper advantage.
- We comply with the anti-corruption legislation in force in the countries where we operate, the relevant national and international regulations and internal company policies. In this context, in particular, we take into account the provisions of the Turkish Criminal Code No. 5237 regarding the crime of bribery, the Law No. 3628 on Declaration of Assets, Combating Bribery and Corruption, the U.S. Foreign Corrupt Practices Act of 1977 (FCPA), the United Kingdom Bribery Act (UK Bribery Act) and other relevant legislation.
- We do not accept unofficial payments made for the purpose of facilitating or accelerating public transactions.
- We do not allow unlawful payments to be made or benefits to be provided through representatives, consultants, intermediaries or third parties.
- We carry out gift, hospitality, donation and sponsorship activities only if they are in accordance with the relevant legislation, company policies and reasonable commercial practices.
- In cases of suspicious payments, requests or transactions, we report the matter without delay to the Legal Department, the Ethics Hotline or the relevant managers.

09 Antitrust Law/Competition Law

Competition law is one of the fundamental branches of law that aims to protect a free, fair and effective competitive environment in goods and services markets. The fundamental purpose of competition law is to prevent practices that prevent, distort or restrict competition, to prevent undertakings in a dominant position in the market from abusing this power, and to ensure the sustainability of a fair competitive environment in the markets.

As Öztiryakiler, we undertake to act in accordance with the competition/antitrust law legislation in force in all countries where we operate, to support the principles of free competition and not to be a party to any conduct that distorts competition. In this context, in particular, we comply with the Law No. 4054 on the Protection of Competition, European Union competition regulations and other national and international legislation in force in the countries where we operate.

Key Points for Action

- We communicate with competitors only within the scope of legitimate commercial purposes and to the necessary extent; we do not share price, cost, sales quantity, customer information, market sharing, tender strategies or similar competition-sensitive information.
- We do not become a party to agreements, decisions, concerted actions or practices that restrict competition; we avoid conduct that distorts competition such as cartel formation, price fixing, customer or territory sharing, restriction of supply and similar conduct.
- We do not engage in practices that may lead to the abuse of dominant position; in commercial relations conducted with customers, suppliers, dealers and business partners, we act in accordance with the principles of fair competition.
- We do not act in concert in tender processes; we do not share with competitors any information regarding bids, prices, tender conditions or the process that may affect competition.
- We do not unlawfully interfere with the independent commercial decision-making processes of distributors, dealers and business partners; we avoid practices contrary to competition law aimed at determining resale prices.
- We avoid discussions and exchanges that may pose a risk in terms of competition law in sectoral meetings, association activities, fairs and similar environments.
- We report situations that are considered or suspected to be contrary to competition law without delay to the Legal Department, the Ethics Hotline or the relevant managers.

10 Points to Note in Sales and Service Activities

In our sales and service activities, by taking transparency, honesty and customer satisfaction as basis, we provide accurate information, avoid misleading statements and act in accordance with the legal legislation in all processes. We protect the confidentiality of customer data, adopt a fair and respectful communication language, and focus on continuously improving service quality.

Key Points for Action

- We act in accordance with ethical principles at every stage of sales and service processes.
- We comply with the provisions of “Chapter 08 – Prevention of Bribery” and conduct our relations with customers within an appropriate and ethical framework.
- We do not engage in any competition-restricting activity, including cartels, regulated within the scope of “Chapter 09 –Antitrust Law/Competition Law”. We provide our customers with complete, accurate and clear information.
- We avoid misleading, exaggerated or untrue statements.
- We improve our services by evaluating customer feedback.
- We pay attention to the protection of personal data and ensure confidentiality.
- We adopt a transparent and accountable approach in all processes.
- We observe compliance with ethical rules in our relations with our customers and authorized services.
- We comply with the relevant legislation in every country where we operate; duly obtain the necessary permits, licenses and qualifications, and offer our products and services in line with the principles of safety, security and trust.

11 Points to Note in Procurement Activities

Our suppliers, subcontractors and other business partners are important stakeholders of our sustainable success. We conduct our business relations within the framework of the principles of honesty, transparency, fair competition and mutual trust; and we adopt an objective, consistent and traceable approach in our procurement processes. While we aim to develop long-term and healthy business collaborations with our business partners, we attach importance to all parties acting in accordance with ethical and legal standards.

Key Points for Action

- We evaluate our suppliers in line with objective criteria such as price, quality, technology, ESG principles, delivery and reliability, and conduct selection processes transparently.
- We treat all suppliers equally; we observe fairness in relations with small-scale suppliers and subcontractors.
- We conduct commercial relations on the basis of mutual respect and a balanced approach; we avoid unfair practices.
- Within the framework of contractual obligations, we take care to ensure that mutual commitments are fulfilled on time.
- We do not request any benefit that may affect the impartiality of business relations and avoid such interests.

- We evaluate gifts and hospitality according to whether they are compatible with the nature of the business relationship, reasonable and within the framework of company policies.
- We address possible conflicts of interest transparently and, where necessary, keep the relevant persons away from decision-making processes.
- In all activities, we act in accordance with the legislation in force and competition (antitrust) law.
- We encourage our suppliers to be sensitive regarding human rights, the environment and occupational health and safety.
- We take care to ensure that records relating to procurement processes are kept accurately and completely.
- We expect our suppliers to comply with our Supplier Code of Conduct.

12 Quality

Providing our customers with reliable and sustainable products and services at high quality standards is our fundamental reason for existence and our primary mission. In all our activities, we take customer expectations and needs as basis; and we act with a quality-oriented approach at every stage of our product planning, development, R&D, production, certification, product certification, logistics, maintenance-repair and after-sales service processes.

With the innovative studies we carry out in our R&D Center, we continuously improve our products and processes and adopt a production approach in accordance with national and international standards. With a continuous improvement approach, we increase our quality performance, consider customer feedback as an opportunity for development and support the active participation of all our employees in the quality culture.

Key Points for Action

- We act in accordance with quality standards, technical specifications and legal requirements in all our business processes.
- We take customer needs and expectations into account in product planning, development and R&D activities.
- We aim to develop innovative, reliable and sustainable products in our R&D center.
- We carry out studies aimed at continuously improving product and service quality.
- We effectively carry out the certification and product certification processes of our products in accordance with the relevant national and international standards.
- We regularly review and improve the effectiveness of our quality management systems.
- We develop preventive practices that will reduce the risks of errors in production processes.
- We ensure that products are delivered accurately, safely and on time in logistics processes.
- We carry out maintenance and repair activities with an understanding of business continuity, safety and operational efficiency.
- We carefully evaluate customer complaints and produce fast and permanent solutions.
- We regularly measure customer satisfaction and use feedback as an opportunity for development.
- We support training and awareness activities in order to increase the quality awareness of our employees.
- We expect our suppliers and business partners also to work in accordance with our quality standards.
- We aim to increase our quality performance with an understanding of continuous development and innovation.
- We provide widespread and accessible service to our customers through our dealers.
- With our call center providing 24/7 service, we aim to provide fast and effective solutions to customer requests and notifications.
- We provide maintenance, repair and technical support services through our authorized service network.

13 Proper Protection and Utilization of Intellectual Property

Intellectual and industrial property rights are among the fundamental elements of innovative production, technological development, corporate reputation, and sustainable growth. As Öztiryakiler, we attach great importance to the protection of the rights over the products, technologies, designs, trademarks, software, technical know-how, and other intellectual works we develop; at the same time, we are committed to conducting our activities with due respect for the intellectual and industrial property rights of third parties.

As Öztiryakiler, through our manufacturing, R&D, technology development, and innovation activities, we aim to contribute not only to our corporate development but also to the country's economy, industry, exports, and technological advancement. In this context, the protection, effective management, and lawful use of the know-how, designs, inventions, and technologies that emerge constitute one of our fundamental principles.

Key Points for Action

- Patent, We exercise the utmost care in protecting patents, trademarks, designs, copyrights, trade secrets, know-how, and similar intellectual and industrial property rights.
- We recognize as a fundamental principle that the intellectual and industrial property rights of third parties must not be infringed in product development, manufacturing, marketing, sales, software use, and all other activities.
- We take the necessary legal, technical, and administrative measures to protect the products, technologies, designs, software, technical drawings, documents, and similar works developed within the Company.
  We use trademarks, logos, symbols, signs, designs, catalogues, visual materials, technical content, and other corporate materials in accordance with company standards, the applicable legislation, and the Corporate Identity Guideline.
- We act in compliance with copyright laws and licensing terms when using content obtained from the internet, digital platforms, social media, artificial intelligence applications, or other sources.
- We do not share trade secrets, technical data, manufacturing processes, R&D activities, or other Company assets with unauthorized persons.
- If we determine that third parties have infringed the intellectual and industrial property rights belonging to our Company, we immediately report the matter to the relevant departments and cooperate in the processes aimed at protecting such rights.
- We act in compliance with the legislation governing intellectual and industrial property rights, national and international regulations, and the Company's internal policies and procedures.

14 Protection of Company Assets and Separation of Business and Personal Affairs / Prohibition of Conflicts of Interest

Company assets and resources are of critical importance for the continuity of our operations. We use these assets carefully and responsibly and take due care to protect them against the risks of waste, loss, or misuse. While performing our duties, we safeguard the legitimate interests of the Company, maintain a clear distinction between business and personal interests, and avoid potential conflicts of interest.

Key Points for Action

- We use Company assets (financial resources, machinery, equipment, tools, consumables, information assets, etc.) carefully and solely for business purposes, and refrain from using them for personal purposes.
- We incur expenditures in accordance with Company policies and procedures and maintain a clear distinction between business and personal expenses.
- We accurately declare business-related expenses based on supporting documentation.
- We use the devices and systems allocated by the Company with due care; comply with information security and confidentiality principles; and refrain from using them for personal purposes.
- We take due care to protect the Company's information and assets and refrain from their unauthorized use or disclosure.
- While performing our duties, we avoid situations that may conflict with the Company's interests and disclose such situations with transparency.
- We carry out donations, sponsorships, and similar activities in accordance with applicable laws and regulations and Company principles.
- When evaluating business relationships and activities that may give rise to personal interests, we give priority to the interests of the Company.
- We take care not to enter into personal debtor-creditor relationships with customers, suppliers, and other business partners.
- In the event of a potential conflict of interest, we notify our manager in advance and take the necessary measures.
- We do not use Company opportunities for personal gain.
- If a question arises regarding the possibility of a conflict of interest, we consult the Ethics Committee on the relevant facts before undertaking the activity in question in order to determine whether a potential conflict of interest exists.

15 Information Security, Confidentiality Management, and Personal Information Protection

The information obtained, processed, stored, and transferred within the scope of our business activities constitutes important corporate assets in terms of the sustainability of our Company's operations, commercial reputation, business continuity, and the relationship of trust we establish with our stakeholders. As Öztiryakiler, we adopt as a fundamental principle the protection of the confidentiality, integrity, and availability of the information belonging to the Company, employees, customers, suppliers, business partners, and other stakeholders.

In the processes of processing, storing, sharing, transferring, and destroying personal data, we act in accordance with the Personal Data Protection Law No. 6698, the relevant secondary legislation, the decisions of the Personal Data Protection Board, the data protection regulations in force in the countries where we operate, and the Company's internal policies and procedures.

Key Points for Action

- We implement reasonable security measures against risks such as the leakage, loss, and alteration of confidential information (including personal information), and against the risks of damage to information systems arising from external attacks such as cyberattacks through ransomware or computer viruses, malware infections, and unauthorized access.
- Whenever we transmit or share information obtained through our business activities, we appropriately assess the scope of disclosure each time.
- When sharing confidential information with customers or business partners, we execute confidentiality agreements and strictly comply with their terms. We also respect the confidential information of others and refrain from obtaining it through unauthorized means.
- We properly manage usernames and passwords for business computers, tablets, smartphones, and various systems/applications and prevent password reuse. We secure business computers, tablets, and smartphones by locking them with passwords or similar security measures.
- We exercise the utmost caution regarding business email fraud. We carefully and diligently verify emails received from external sources. If an email contains unusual payment instructions or other requests, we do not handle the matter on our own; instead, we consult with and inform our manager or the relevant departments in order to calmly verify the authenticity of the instructions.
- We classify all corporate information according to its level of sensitivity (Top Secret, Confidential, Internal, and Public) and protect it in accordance with these classifications.
- We restrict access to information within the scope of duties and authorities and prevent unauthorized access and use.
- We comply with all information security policies, procedures, and instructions and contribute to the implementation of the necessary control mechanisms in line with a risk-based security approach.
- We ensure that critical systems, servers, and information assets are protected in secure environments and prevent access by unauthorized persons.
- We ensure that visitors' access within the Company is kept under control and, where necessary, that they are accompanied.
- We use business systems and information technology resources solely for business purposes and refrain from unauthorized software use and from any conduct that may jeopardize system security.
- We comply with the "clean desk / clean screen" principle in our work areas and do not leave confidential information in open environments.
- We store confidential information in printed and digital form securely and destroy it by appropriate methods when it is no longer needed.

- We use information and devices taken outside the Company with due care and protect them against the risks of loss, theft, or unauthorized access.
- We process personal data only for specified, explicit, and legitimate purposes; in a lawful, proportionate, and purpose-limited manner. When the purpose of processing ceases to exist, we delete, destroy, or anonymize personal data in accordance with the applicable legislation and the Company's internal retention and destruction policies.
- Prior to sharing personal data with third parties domestically or abroad, we evaluate the purpose of the transfer, the categories of data, the recipient party, the legal basis, the security measures, and, where applicable, the transfer mechanisms.
- In processes involving the transfer of personal data abroad, we act in accordance with Article 9 of the Personal Data Protection Law and the relevant provisions of the applicable Regulation; where necessary, we obtain the opinion of the Legal Department regarding standard contractual clauses, binding corporate rules, undertakings, or other appropriate transfer mechanisms.
- In the event of ransomware, phishing, fraudulent payment instructions, unauthorized access, data leakage, or any suspicion of an information security breach, we immediately report the matter to the relevant manager, the Information Technology Department, the Legal Department, and/or the Ethics Hotline.
- We evaluate and respond to applications, requests, and complaints submitted by data subjects regarding their personal data in accordance with the time limits and procedures prescribed by the applicable legislation.

16 Export Control

As a responsible corporate member of the international community, one of our fundamental obligations is to comply with national and international regulations aimed at preventing our products and technologies from being used for the financing of terrorism, unlawful activities or violations of export controls. Accordingly, we implement effective export control processes to ensure that our products and technologies are managed in compliance with applicable export control legislation.

Key Points for Action

- We establish the relevant policies and the organizational structures and systems based on those policies to ensure reliable export control management.
- In the export of products or technologies abroad, we comply with the processes set forth in the applicable legislation and regulations and, where applicable, the Company's internal policies and rules. Within the framework of international agreements and the applicable legislation, we assess the compliance of exports and duly fulfill the required declarations, authorizations, and other obligations.

17 Proper Financial Reporting and Fulfillment of Tax Obligations

The accuracy, transparency, and reliability of financial and accounting records are among the fundamental elements of our corporate reputation and sustainability. We conduct all financial transactions in accordance with the applicable legislation, the Company's policies and procedures, and generally accepted accounting standards; and we ensure that financial reporting is carried out accurately and in a timely manner. We fulfill our tax obligations completely and honestly and adopt transparency as a fundamental principle in all our activities.

Key Points for Action

- We maintain all accounting records accurately, completely, and in a timely manner so as to reflect the true nature of the transactions.
- We conduct financial reporting processes in compliance with the applicable legislation and generally accepted accounting principles.
- We ensure the effective implementation of internal control systems relating to financial reporting.
- We ensure the proper classification and reporting of revenues, expenses, and other financial items.
- We refrain from preparing financial records in a misleading manner for the purpose of achieving any objective.
- We promptly report any financial transactions that appear suspicious or inconsistent to the relevant managers and departments.
- We prepare and submit tax returns accurately and in a timely manner in accordance with the applicable legislation.
- We conduct financial transactions in a transparent and accurate manner and ensure that records are complete and reliable.
- We conduct financial transactions only through lawful and reliable institutions.
- We report suspicious financial activities to the relevant departments and manage the relevant processes in accordance with our legal obligations.

18 Disclosure of Company Information and Prevention of Insider Trading

As Öztiryakiler, we attach importance to ensuring that information relating to our activities is managed accurately, fairly, transparently, completely, in a timely manner, and in compliance with the applicable legislation.

Within the scope of our duties, we are obliged to use confidential information, trade secrets, information belonging to customers and business partners, financial data, technical information, and non-public Company information that we have access to only to the extent required by our work. We do not accept the use of such information for personal benefit, its disclosure to third parties, or its improper disclosure.

Key Points for Action

- We do not share non-public Company information, trade secrets, financial data, customer information, technical information, strategic plans, and similar confidential information with unauthorized persons.
- We do not obtain personal benefit by using information acquired in the course of our duties, nor do we disclose such information to third parties, either directly or indirectly.
- We disclose Company information only by authorized persons and in accordance with the applicable legislation, Company policies, and approval processes.
- In sharing information with the press, media, social media, public authorities, investors, customers, or third parties, we act in accordance with the principles of accuracy, transparency, and confidentiality.
- Even if employees leave the Company, their obligations regarding the protection of confidential information acquired during the course of their duties continue.
- If there is any suspicion that confidential information has been used, shared, or disclosed without authorization, we immediately report the matter to the relevant managers, the Legal Department, or the Ethics Hotline.