

CODE OF CONDUCT

1. INTRODUCTION

Özaltın Holding A.Ş. and its affiliated group companies (collectively referred to as “Özaltın” or the “Group”) adopt as a fundamental principle not only the creation of economic value but also acting in accordance with ethical values, the law, human rights, and a sense of social responsibility while conducting their operations.

Özaltın’s long-standing corporate heritage and operations across diverse regions necessitate the establishment of a common ethical stance and standard of conduct throughout the Group. Prepared in this context, the Code of Ethics and Business Conduct serves as a guiding framework for all employees working within Özaltın, as well as for managers and business partners acting on behalf of Özaltın, aiming to provide guidance for making correct and responsible decisions in situations encountered in daily business life.

This document forms the foundation of the ethics and compliance framework established within Özaltın Holding. The policies, procedures, and practices in effect across the Group are evaluated in conjunction with this Code of Ethics and Business Conduct and are complementary to one another.

Our founder said it; we will carry it forward.

“It is always good to move forward by rejecting what is wrong.”

We began our work with the question, “What does it mean to be a good company?” Being a good company starts with defining what it means to be good. The criteria for being good are established, and we continuously measure whether we meet them.

Is this enough? In today’s world, where the definition of “good” is constantly evolving, this alone will not suffice. The criteria for being good are evaluated and updated in light of both customer expectations and market conditions. Whether we are good or not is now measured against new criteria; the sustainability of this approach is ensured through a mindset of continuous improvement. Being good is a prerequisite for being competitive. It is also taken into account that competition transcends national borders and has an international character.

In all our activities and processes, we act in accordance with the ethical professional principles and business ethics rules of our industries; we conduct business in compliance with all laws and regulations in effect in the countries where we operate.

The core values listed below form the foundation of our Code of Ethics and Business Conduct. Achieving these high standards may not always be easy; however, providing the necessary guidance and support to ensure our employees, suppliers, and business partners adhere to these rules is our priority.

We acknowledge that the rules we must follow regarding our approach and operations are not limited to these headings alone, and that not all ethical conduct can be defined by written rules.

Hayrettin ÖZALTIN

Chairman of the Board

2. PURPOSE AND SCOPE

2.1 Purpose

The purpose of this Code of Ethics and Business Conduct is to:

to establish and maintain a business culture within Özaltın Holding A.Ş. and all group companies that is consistent with ethical principles, applicable laws and regulations, and sound corporate governance practices.

In this context, the Code of Ethics and Business Conduct:

- Fosters the adoption of a common ethical understanding across the Group,
- Establishes the fundamental behavioral standards that employees and managers must adhere to while performing their duties,
- Prevents ethical risks and effectively managing potential violations

2.2 Scope

This Code of Ethics and Business Conduct;

- Özaltın Holding A.Ş. and all affiliated group companies,
- All employees, managers, and board members working within the Group,
- business partners, consultants, representatives, and third parties acting on behalf of Özaltın.

In this Code of Ethics and Business Conduct, the terms “Company” or “Özaltın” refer to Özaltın Holding A.Ş. and all its subsidiaries and affiliates, whether directly or indirectly controlled.

In the event of a conflict between the provisions of local laws in the countries where the Group operates and this Code of Ethics and Business Conduct, the regulation that establishes higher ethical standards shall prevail.

3. FUNDAMENTAL ETHICAL AND CONDUCT PRINCIPLES

Özaltın commits to acting in accordance with the fundamental ethical and behavioral principles outlined below in all its activities.

3.1 Integrity and Honesty

Özaltın adheres to the principles of honesty and integrity in all its business and activities.

Employees and managers are obligated to act truthfully, transparently, and reliably while performing their duties.

3.2 Compliance with Laws and Regulations

Özaltın considers compliance with the laws and regulations in effect in all countries where it operates to be a fundamental obligation.

No unlawful conduct or practices will be tolerated.

3.3 Transparency and Accountability

Özaltın prioritizes transparency and accountability in its business processes.

Decision-making processes are guided by integrity, traceability, and a sense of responsibility.

3.4 Respect for Human Rights and Employee Rights

Özaltın is committed to respecting universal human rights and providing a fair, safe, and respectful work environment for employees.

A zero-tolerance approach is adopted toward practices such as discrimination, harassment, and forced labor.

3.5 Occupational Health and Safety

The health and safety of employees, business partners, and all stakeholders affected by our operations are a top priority for Özaltın.

Compliance with occupational health and safety regulations is mandatory for all employees.

3.6 Social and Environmental Responsibility

Özaltın operates with a commitment to sustainability, taking into account the environmental and social impacts of its operations.

Environmental protection and the promotion of social benefit are integral parts of how we conduct business.

4. EMPLOYEE RELATIONS

Özaltın considers its employees to be one of its most important stakeholders and conducts all employee relations based on the principles of mutual respect, fairness, and trust.

4.1 Equality, Prohibition of Discrimination, and Stance Against Harassment

Özaltın adheres to the principle of equality in hiring, promotion, training, compensation, and all employment processes.

No discrimination based on race, color, gender, marital status, age, nationality, ethnic origin, religion, belief, political opinion, disability, or any similar grounds will be tolerated.

Any form of psychological harassment (mobbing), physical or verbal harassment, or humiliating behavior is strictly prohibited in the workplace. Özaltın considers such behavior to be a serious ethical violation.

4.2 Work Environment and Employee Rights

Özaltın is committed to providing its employees with a safe, healthy, and respectful work environment.

Working hours, compensation, leave, and social benefits are administered in accordance with applicable laws and company policies.

Forced labor and child labor will not be tolerated under any circumstances. Özaltın adopts this approach as a fundamental expectation for its business partners and suppliers as well.

4.3 Occupational Health and Safety

The health and safety of employees, business partners, and third parties affected by operations are a priority for Özaltın.

Compliance with occupational health and safety regulations is mandatory for all

employees, and their active participation in health and safety-related regulations is crucial for an effective and efficient management system.

Employees are required to comply with applicable occupational health and safety regulations, as well as internal company policies and instructions. Unsafe conditions and behaviors must be reported immediately.

4.4 Confidentiality and Protection of Personal Data

Özaltın protects the confidentiality of employees' personal data and uses such data only for lawful purposes.

Employees are also obligated to protect the confidentiality of personal, commercial, and technical information obtained in the course of their duties.

Sharing confidential information with unauthorized persons or using it for purposes other than intended is considered an ethical violation.

4.5 Reporting Ethical Violations

If employees encounter a situation that violates the Code of Ethics and Business Conduct, relevant policies, or applicable laws, or if they have any suspicions in this regard, they must report such incidents through **the procedures and channels specified in the Whistleblower Policy**.

Retaliation against employees who report in good faith will not be tolerated under any circumstances.

5. RELATIONS WITH STAKEHOLDERS AND THE GOVERNMENT

In conducting its operations, Özaltın adheres to the principles of integrity, transparency, and mutual trust in its relationships with all stakeholders.

5.1 Relationships with Customers

Özaltın adopts an honest, transparent, and trustworthy approach toward its customers. Information regarding products and services is shared accurately, clearly, and in a timely manner; misleading or incomplete information is avoided.

Customer satisfaction is viewed as a fundamental element of long-term trust-based relationships.

5.2 Relationships with Suppliers and Business Partners

Özaltın conducts its relationships with suppliers and business partners based on the principles of fair competition, transparency, and objectivity.

Criteria such as quality, cost, reliability, and ethical compliance are considered in the selection of suppliers.

Business partners are expected to act in accordance with the Code of Ethics and Business Conduct, relevant policies, and applicable laws.

5.3 Compliance with Competition Rules

Özaltın complies with all legislation regarding the protection of competition. No exchange of information with competitors regarding prices, market share, or any other matter that could restrict competition takes place.

Any conduct that could undermine free and fair competition is avoided.

5.4 Relations with Government Agencies and Public Officials

Özaltın adheres to the principles of integrity, transparency, and legal compliance in its relations with government agencies and public officials.

Bribery, corruption, facilitation payments, or the provision of any improper benefit are strictly prohibited.

Detailed regulations regarding these matters are addressed in **the Anti-Bribery and Anti-Corruption Policy** and other relevant policies.

5.5 Political Activities and Donations

Özaltın does not make any direct or indirect financial contributions to political parties, candidates, or political activities. Donation and sponsorship activities are conducted in accordance with the provisions of relevant policies and legislation.

5.6 Media and Public Relations

Statements made on behalf of Özaltın and communication with the media are conducted through authorized individuals.

Employees shall avoid any behavior that could lead to their personal views being perceived as Özaltın's corporate stance.

6. CONFLICTS OF INTEREST, GIFTS, DONATIONS, AND SPONSORSHIP

Özaltın places great importance on the principles of impartiality, integrity, and transparency in decision-making processes. Employees, managers, or individuals acting on behalf of Özaltın are not permitted to allow their personal interests to conflict with Özaltın's interests or to create the perception of such a conflict.

6.1 Avoiding Conflicts of Interest

Conflict of interest: A situation in which the interests of an employee or manager—or those of their relatives, or individuals or organizations with whom they have a relationship—directly or indirectly conflict with Özaltın's interests, or create the impression of such a conflict.

Employees and managers;

- must avoid personal, financial, or commercial interests that could influence their duties at Özaltın,
- promptly report any situations that could create a potential conflict of interest to the relevant managers and/or departments,
- and must refrain from any conduct that could compromise their impartiality.

The procedures and principles regarding conflicts of interest are set forth in detail in the relevant policies and procedures.

6.2 Gifts and Hospitality

Özaltın adheres to the principles of transparency and moderation in its gift and hospitality practices.

Accepting or offering gifts, benefits, or privileges intended to influence business decisions or that could create the perception of such influence is prohibited.

Employees;

- must ensure that gifts offered or requested within the scope of business relationships do not influence decision-making processes,
- The company is responsible for ensuring that gifts and hospitality provided to public officials or third parties comply with applicable laws and company policies

Detailed rules regarding gifts and hospitality are set forth in **the Gift and Hospitality Policy** and **the Anti-Bribery and Anti-Corruption Policy**.

6.3 Donations and Sponsorship Activities

Özaltın conducts its donation and sponsorship activities within the framework of providing social benefit and corporate responsibility.

These activities may not under any circumstances be used as a means to influence business relationships, secure improper benefits, or serve political purposes.

Processes related to donations and sponsorships;

- Applicable laws and regulations,
- Özaltın’s corporate values and ethical principles,
- Relevant policies and procedures.

Detailed regulations regarding donation and sponsorship activities are set forth in **the Donation and Sponsorship Policy**.

6.4 Relations with Public Officials

In dealings with public officials, any gifts, donations, hospitality, or benefits that could give rise to a conflict of interest or create the appearance of one are strictly prohibited.

In this context, the procedures and principles to be followed in dealings with public officials are subject to **the Anti-Bribery and Anti-Corruption Policy** and the relevant provisions of the law.

7. CONFIDENTIALITY, INFORMATION SECURITY, AND PROTECTION OF COMPANY ASSETS

Özaltın considers the protection of the information, documents, and assets it possesses within the scope of its activities to be an integral part of its corporate responsibility.

7.1 Protection of Confidential Information

All information of a commercial, financial, technical, or strategic nature pertaining to Özaltın, its employees, business partners, customers, and other stakeholders is considered confidential.

Employees and managers;

- shall not share confidential information obtained in the course of their duties with unauthorized persons,

- to use such information solely for legitimate business purposes,
- and to continue to comply with confidentiality obligations even after their employment ends.

The unauthorized use or disclosure of confidential information is considered a serious ethical violation.

7.2 Protection of Personal Data

Özaltın is committed to full compliance with applicable laws and regulations regarding the protection of personal data.

Employees are obligated to use personal data accessed in the course of their duties in a lawful, limited, and proportionate manner.

The unauthorized sharing, alteration, or destruction of personal data is prohibited.

7.3 Information Systems and Digital Security

Özaltın's information systems, digital infrastructure, and technological tools must be used solely for business purposes.

Unauthorized access, misuse, data leaks, or any behavior that could jeopardize information security must be avoided.

Rules and technical measures regarding information security are established in accordance with the relevant policies and procedures.

7.4 Protection of Company Assets

All tangible and intangible assets belonging to Özaltın (including facilities, equipment, vehicles, intellectual property rights, trademarks, and reputation) must be protected and used solely for business purposes.

The use of company assets for personal gain or engaging in conduct that could result in damage to such assets is unacceptable.

8. COMPETITION, SANCTIONS, AND INTERNATIONAL TRADE

Özaltın is committed to conducting its business in accordance with the principles of fair competition and international trade rules.

8.1 Compliance with Competition Rules

Özaltın refrains from any conduct that restricts or distorts competition. Price-fixing with competitors, market sharing, bid rigging, or the exchange of information that restricts competition are prohibited.

Employees are obligated to avoid any conduct that could pose a risk of violating competition law.

8.2 International Sanctions and Export Controls

Özaltın fully complies with international sanctions and export control regulations in effect in the countries where it operates.

Transactions involving individuals, entities, countries, or regions subject to sanctions are evaluated in accordance with the relevant policies and legal provisions.

The procedures and principles to be applied in this context are set forth in **the Sanctions and Export Controls Policy**.

8.3 Anti-Money Laundering and Combating the Financing of Terrorism

Özaltın commits to complying with all legal obligations regarding the laundering of assets derived from criminal activities and the fight against the financing of terrorism.

In this context;

- Due diligence and care are exercised regarding suspicious transactions and activities,
- Relevant reporting obligations are fulfilled.

Detailed regulations regarding these matters are set forth in **the Compliance Policy** and related policy documents.

8.4 Cross-Border Activities

Özaltın adheres to international standards and best practices in addition to local legislation in its cross-border activities.

In activities conducted in different countries, regulations that set higher ethical standards are followed.

9. WHISTLEBLOWING, PROTECTION AGAINST RETALIATION, AND INVESTIGATION PROCESS

Özaltın encourages the reporting of conduct that violates ethical principles, the Code of Ethics and Business Conduct, relevant policies, or applicable laws, and ensures that such reports are handled effectively, confidentially, and fairly.

9.1 Reporting Violations

Employees, managers, and third parties acting on behalf of Özaltın; are required to report any situation that violates the Code of Ethics and Business Conduct, relevant policies and procedures, or applicable laws, or if they have reasonable grounds to suspect such a violation, through **the procedures and channels specified in the Whistleblower Policy**.

Reports;

- Directly to managers,
- To the relevant departments,
- or through the Ethics Hotline or other channels defined in the Whistleblowing Policy.

9.2 Confidentiality and Impartiality

All reports of ethical violations are handled in accordance with the principles of confidentiality and impartiality.

The identities of individuals making reports are not shared with third parties unless legally required.

Investigation and evaluation processes are conducted in accordance with the principles of objectivity, fairness, and confidentiality.

9.3 Protection Against Retaliation

Özaltın absolutely does not tolerate any retaliation against individuals who report in good faith.

Retaliation includes the dismissal of the person who filed the report, a change in their work location or job title, adverse changes to their salary or benefits, or any other similar adverse action.

Any conduct constituting retaliation is considered a serious ethical violation.

9.4 Investigation Process

Reports are evaluated in accordance with **the Whistleblower Policy** and relevant procedures.

Where deemed necessary, review and investigation processes are initiated.

During the investigation process:

- The parties' right to defense is respected,
- Evidence is evaluated objectively,
- The process is completed as quickly and efficiently as possible.

10. DISCIPLINE, SANCTIONS, AND ENFORCEMENT

10.1 Discipline and Sanctions

Conduct that violates the Code of Ethics and Business Conduct, relevant policies, or applicable laws is subject to disciplinary sanctions by Özaltın.

The sanctions to be imposed:

- The nature and severity of the violation,
- Whether the violation was intentional,
- Whether the violation is repeated

and other relevant factors.

Detailed regulations regarding disciplinary processes and sanctions are carried out within the framework of relevant policies and procedures.

10.2 Entry into Force and Binding Effect

This Code of Ethics and Business Conduct enters into force on the date they are approved by the Board of Directors of Özaltın Holding A.Ş.

- These are binding for Özaltın Holding A.Ş. and all group companies,
- and apply to employees, managers, and all third parties acting on behalf of Özaltın.

This Code of Ethics and Business Conduct does not supersede existing or previously published Özaltın Holding policies and procedures; such policies and procedures continue to apply as an integral part of this Code of Ethics and Business Conduct.

10.3 Updates and Revisions

Özaltın reserves the right to update and revise the Code of Ethics and Business Conduct in light of changes in legal regulations, areas of operation, or corporate structure.

The current version is shared with employees and relevant stakeholders through appropriate communication channels.