

CORPORATE CODE OF CONDUCT

1. Introduction

Our "Corporate Code of Conduct" covers the basic values and practices we have determined for all employees and stakeholders of our company. This policy is based on the principles of honesty, fairness, respect and responsibility. It is aimed that all our employees contribute to the protection and development of our company's reputation by acting in accordance with these principles while performing their duties.

2. Core Values

Honesty

Honesty is the foundation of our business. Every employee must be honest in business processes and interpersonal relations, must not distort the facts or provide misleading information. The credibility and reputation of our company depends on the honesty of our employees.

Fairness

Fairness is a principle that must be observed in all our business processes and decisions. Every employee must act fairly and impartially, and avoid discrimination, injustice and prejudice. Fairness requires respecting the rights of our employees, customers and society.

Respect

Respect is a value that underpins our relationships with all parties. Our employees must treat each other, customers and other stakeholders with respect and be open to different views and cultures. Respect supports sincere and constructive communication in the work environment.

Responsibility

Responsibility is important for the sustainability of our business. Every employee must fulfill their duties in the best way possible, use company resources effectively and efficiently, and fulfill their environmental and social responsibilities. Responsibility ensures the long-term success of our company. In this context, Ankasan has determined its Quality Policy, Occupational Health and Safety Policy, Environmental Policy, Human Resources Policy, Equality at Work Declaration and Sustainability Principles and ensured that they are shared with all parties.

3. Principles

Employee Behavior (001)

Our employees are expected to behave in accordance with the values of our company. Every employee must act in accordance with professional and ethical requirements, and be respectful and fair to colleagues, customers and other stakeholders. The principles of behavior expected from our employees are as follows:

- Employees are obliged to act in accordance with the "Corporate Code of Conduct" and laws, declared rules and regulations.
- All employees carry out their duties in an equitable, transparent and accountable manner.
- For the protection and development of the company's prestige, all employees are aware of the importance of their behavior in the field of activity of the company within the framework of legal requirements and general ethical rules and are attentive in these matters.

ANKASAN MAKİNE A.Ş.

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- They cannot engage in behaviors, aggressive attitudes, threatening speech and acts, harassment, disturbance, etc. that disrupt the efficiency and trust of the working environment.
- They cannot keep any item or substance that poses a danger to the workplace and/or employees or that is illegal in the workplace.
- Except for those kept in accordance with a valid doctor's report; they do not keep drugs, addictive substances, substances that restrict or eliminate mental or physical abilities in the workplace, and cannot work in the workplace and within the scope of work while under the influence of such substances.
- They cannot engage in other commercial activities during company working hours. They may engage in commercial activities outside of working hours, provided that the company is notified.
- They protect Company assets and ensure their efficient use. The company's assets are used only for business purposes. They protect them against possible loss, damage, misuse, abuse, theft and sabotage.
- All employees follow the general dress code. They comply with all Occupational Health and Safety rules in the workplace.
- Unless authorized by the management, they cannot engage in any behavior, statement or correspondence that would put the company under commitment.
- Employees act with the awareness that financial, technical, legal, etc. information belonging to the company and information that may weaken its competitive power, employee rights and information, agreements with business partners are within the framework of "confidentiality" and are obliged to ensure their protection and confidentiality.
- They cannot share non-public information about the companies they work for, their customers and other persons and companies they do business with, and information and documents learned as a business necessity, with unauthorized persons and authorities inside and outside the organization. They cannot (directly or indirectly) use such information for speculative purposes.
- They know that it is a legal offense to try to obtain any commercial benefit, directly or indirectly, by giving company information to third parties.
- Employees are responsible for taking the necessary measures to protect confidentiality and complying with the confidentiality obligation even after leaving the company.
- They do not gain unfair advantage from individuals and organizations in any way, do not take or give bribes. They prevent such acts to the extent they are aware of, and act in accordance with anti-corruption rules.
- They do not accept direct or indirect gifts related to the Company's business, cannot provide benefits and do not borrow money from persons or companies with whom the Company has business relations.
- They do not take advantage of title and authority to gain unfair benefits in favor of themselves, their relatives or third parties.
- In personal investments to be made, they do not fall into a conflict of interest situation with the current organization.
- They do not use the resources and facilities of the Company to support political activities. They do not carry out political activities in the Company. Demonstrations, propaganda and similar activities on political issues are not permitted. Company resources (such as vehicles, computers, e-mails) are not allocated for political activities.
- Provided that it does not disrupt the working hours and order, they may take part in foundations, professional and social associations and associations, platforms and similar associations, platforms and similar organizations established or to be established by employees. However, this must be notified to the Company.
- Religious propaganda is not allowed in the Company; opinions on these issues are not expressed or discussed in the working environment.

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- They do not share posts that attack religion, language, race, politics and personal rights through Company accounts. They act in accordance with the law and general principles of morality in all kinds of communication and sharing on social media channels, forums, personal blogs, social media accounts, on the web and on all platforms, including mobile applications, which are not provided or controlled by the Company.

Management's Responsibility (002)

- Ankasan is responsible for determining the “ Corporate Code of Conduct”, communicating it to employees and ensuring that these principles and practices are carried out correctly.
- Our basic principle is to provide employees with a safe, healthy, respectful and fair working environment. In this context, the Equality at Work Declaration and Human Resources Policy have been established and shared with all parties.
- In the recruitment process, the Company seeks suitability for the job as the basic criterion and provides equal opportunity without discrimination (language, race, color, gender, political opinion, belief, religion, sect, age, physical disability, etc.).
- Provides equality of opportunity and means for the development of employees.
- Determines fair and competitive wage policies.
- Provides equality of opportunity in appointments, promotions, rotations and rewards.
- Does not allow bullying and harassment in the workplace in any way.
- Evaluates the opinions and suggestions of employees.
- Does not share private information about employees (except for legal obligations) without the consent and knowledge of the employee.
- Adheres to fundamental human rights.
- Respects the right to form associations and join labor unions; allows employees to unite among themselves to appoint a representative or to be elected as a representative.

Compliance with Laws and Legal Procedures (003)

Ankasan adopts the principle of acting in compliance with all laws, rules and regulations of the Republic of Türkiye in the context of its establishment.

- All activities are fully and appropriately planned, managed, recorded and reported in accordance with the law.
- Contracts with third parties and organizations are ensured to be clear and understandable in accordance with laws, regulations and ethical rules.

Customer Relations (004)

We must adhere to the principles of honesty, fairness and respect in our relationships with our customers. Customer satisfaction is critical to the success of our business. Our responsibilities towards our customers are as follows:

- Ensures high quality in our products and services.
- Protects the confidentiality of customer information.
- Handles customer complaints and feedback seriously.

Supplier Relations (005)

Ankasan selects suppliers by evaluating them according to objective criteria.

- Aims to work with suppliers to develop long-term mutually beneficial relationships in accordance with quality, environmental performance and sustainability goals for the benefit of both parties.

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- Ensures that these companies do not engage in unethical or illegal acts, encourages them to fulfill their legal obligations, to respect human rights, to act in accordance with the principles of business ethics and anti-corruption, safety and environmental protection.
- Complies with reasonable confidentiality and occupational safety rules requested during supplier company visits and audits.

Competitor and Competition Relations (006)

- Ankasan does not enter into agreements or engage in behaviors with competitors, other persons or entities, that directly or indirectly have the purpose or effect (or may have the effect) of preventing, distorting or restricting competition, except within the limits permitted by the legislation.
- In cases where it is in a dominant position in a particular market, either alone or together with other undertakings, it does not abuse this position.
- It does not conduct negotiations and information exchange with competitors in order to determine market and/or competition conditions together.
- Avoids all kinds of meetings and transactions that may lead to or be considered as causing the above-mentioned situations in meetings of associations, councils, chambers, professional unions, etc. and other private or professional meetings and negotiations.

Social Responsibility (007)

Our company aims to contribute to environmental and social sustainability by fulfilling its social responsibilities. What we need to do in this context are to:

- Reduce our environmental impact.
- Collaborate with local communities.
- Support social projects and relief efforts.

Financial Responsibility and Accurate Records (008)

- All employees, suppliers, and Ankasan must maintain accurate business records for all aspects of Ankasan's business activities, from product inspections, time recording, and safety reporting to financial accounting and environmental reporting.
- Ankasan complies with generally accepted accounting principles, and accounting records accurately and non-misleadingly reflect the nature of all transactions. This includes adhering to obligations regarding the expected disclosure of financial and non-financial information in accordance with applicable regulations and prevailing industry practices.

Precautions Against Counterfeit Products (009)

- Within the scope of its operations, Ankasan avoids any actions that could infringe third-party intellectual and industrial property rights, such as patents, utility models, industrial designs, copyrights, trademarks, and similar rights, or that could lead to unfair competition.
- Employees will take all necessary precautions to comply with these requirements and immediately report any non-conformances they become aware of to the Human Resources department.
- Ankasan will take the necessary measures to prevent the purchase and use of counterfeit products.

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- If counterfeit/imitated parts are detected in materials procured from suppliers or customers, Ankasan quarantines the materials, reports the defects, permanently marks them as "counterfeit parts," and physically damages the materials to prevent their use for other purposes.
- Ankasan guarantees, through contracts with customers, that all products it manufactures comply with customer specifications.

Export Control and Economic Sanctions (010)

- Ankasan is committed to complying with all relevant customs, trade, and export laws and regulations.
- It complies with all applicable export and import laws and regulations when transferring products and services within its country and across national borders.
- It is required to comply with relevant national and international sanctions and practices and fully comply with all duties, taxes, and tax obligations.
- Export controls and economic sanctions regulate when, where, and to whom we may sell, provide, or transfer our products, services, or technical data.
- If Ankasan is unsure about the applicability of export controls or economic sanctions to a particular transaction, it consults its own legal advisors.

4. Compliance and Reporting

An effective reporting system has been established to ensure the implementation and compliance with the "Corporate Code of Conduct".

- Employees may report unethical behavior and practices contrary to the policy in writing or verbally.
- Employees may report unethical behavior and practices contrary to the policy to the General Manager, Assistant General Manager and/or Human Resources Department.
- All personnel in the organization report unethical behaviors and practices contrary to the policy that are reported to them to the Human Resources Department.
- Reports do not mean direct action. The decisions and sanctions given after examining evidence, witnesses, legal rights, disciplinary regulations, etc. are not binding for the reporting personnel.
- Anonymous reports are taken into consideration and examined.
- Transparent and fair investigation process is applied.
- The participation of the company lawyer in the examination process is essential.
- It is ensured that unethical behaviors and practices contrary to the policy are stopped immediately.
- ANKY-001 ANKASAN Personnel Disciplinary Regulation is applied in case of violations, with legal compliance being the basis.
- All activities within the scope of the "Corporate Code of Conduct" are reported by the Human Resources Department.

5. Objectives

It is aimed to ensure that the "Corporate Code of Conduct" is fully implemented by all parties and to ensure an interaction in compliance with the requirements within and outside the organization. For this purpose;

- It is ensured that 100% of the personnel in the recruitment process are provided with this "Corporate Code of Conduct" informative training.
- Annual information and awareness training on the "Corporate Code of Conduct" is organized for 100% of the employees.
- It is ensured that the "Corporate Code of Conduct" is accessible to all parties by keeping it up-to-date on the website, in-house server system and bulletin boards.
- All unethical behaviors and practices contrary to the policy are recorded by the Human Resources Department.
- In March of every year, the "Ethics Report" of the previous year is reported to the Senior Management.
(If there were no reports, violations, etc. in the relevant period, the report is replaced with the information that there were no incidents.)

6. Conclusion

"The Corporate Code of Conduct" sets out the core values and expectations of our company and serves as a guide for all employees and stakeholders. It is the responsibility of every individual to comply with this policy in order to protect the credibility and reputation of our company. By adhering to ethical principles, it is possible to create a sustainable and successful business environment.