

ÇİMTAŞ CODE of ETHICAL CONDUCT

The Çimtaş Code of Ethical Conduct has been prepared with a view to defining the corporate codes of practice and individual rules of conduct, in line with the Vision, Mission, Values and Strategies of Çimtaş, putting in writing the ethical principles on which Çimtaş bases its relations with its customers, suppliers and other business partners and seeks to extend these principles across its entire value-chain, expecting equal sensitivity and diligence from its suppliers, subcontractors, consultants, service providers, representatives and other business partners (hereinafter referred to as “Suppliers”).

In compliance with the Çimtaş corporate culture, we believe that ensuring the Code of Ethical Conduct is known and exercised by all our employees and Suppliers, and being principled, meticulous and standard in our behaviors will be positively reflected on our business results, and shall thus maximize the satisfaction of all our stakeholders.

All Çimtaş employees are expected to pay the utmost attention and commitment to the ethical code of conduct.

OUR CODE OF BUSINESS ETHICS

1. TO ACT IN LINE WITH CORPORATE QUALITY PRINCIPLES

1.1 Law-Abiding and Legal Transactions

At Çimtaş, all business activities and its accounting system are managed to be completely and fully in line with the law and with company policy and business principles, and are recorded and reported as such.

Suppliers are accountable for understanding and adhering to national and international laws, regulations, and other official legislation relevant to their operations and business.

1.2 Social Responsibility

At Çimtaş, projects are developed with a social responsibility approach, and collaborations are made with relevant institutions to this end. Projects that contribute to the resolution of problems related to the quantitative inadequacy of qualified employees and unproductive employment, which are among the most significant problems facing our country, constitute the primary social responsibility activities of Çimtaş. In addition, Çimtaş employees are sensitive to issues related to the environment, the preservation of nature and public, and behave properly in respect of these.

Çimtaş expects Suppliers to strive to contribute to sustainable development including health and the welfare of society through fostering all seven principles of ISO 26000 and to commit ethical behavior adhering to the good engineering practices.

1.3 Customer Relations

At Çimtaş, we work in a proactive manner that is customer-satisfaction oriented, and which meets the demands and needs of our customers promptly and correctly. We develop long term relationships with our clients that are built on trust and on the basis of respect and

courtesy, and while creating value for our customers through operational perfection and flexibility, we also meet their demands and needs with a high degree of satisfaction and expect Suppliers to exhibit the same principles of trust, respect and commitment in their dealings with Çimtaş.

1.4 Supplier Relations

At Çimtaş, we work with Suppliers who possess a corporate quality system, who are ethical and honest, who are familiar with our business approaches, and who have criteria-proven competency. The performance of Suppliers is constantly evaluated within the scope of certain competency criteria and their corporate development is supported.

1.5 Competition

At Çimtaş, we refrain from using dishonest advertising and sales methods, we do not discredit our competitor's products and activities with misleading statements, and we do not try to gain a competitive edge by portraying the competencies of Çimtaş as different from what they really are.

Suppliers are responsible to conduct their activities in accordance with all applicable competition laws and regulations and to promote fair competition.

2. RESPECTING HUMAN RIGHTS

Çimtaş and Suppliers are committed to respecting all human rights. To that end, Çimtaş does not tolerate knowing or unknowing involvement in, allowance for, or support of slavery, servitude or forced or compulsory labor, exploitative child labor, or human trafficking in the performance of the work or anywhere in Suppliers' supply chain or business. Suppliers represent and warrant that it will adhere to all applicable laws, regulations, and codes, relating to human rights and anti-slavery. Suppliers shall ensure that their subcontractors and lower-tier suppliers give a substantially identical undertaking in their subcontracts and purchase orders for the work.

2.1 Diversity and Inclusion

Our labor force is made up of gifted professionals who are dedicated to the attainment perfect results for all our stakeholders. Our aim is to empower Çimtaş employees by encouraging cooperation while benefiting from the knowledge and skills of each and every one of our diversified employees. To this end, we respect and value the different backgrounds, experiences and ideas of our employees in all levels of Çimtaş activities.

2.2 Fair Employment Practices

At Çimtaş, all employment decisions are based solely on the criteria of suitability for the job. In matters of employment, equal opportunities for all are assured, with no discrimination made on the basis of nationality, race, language, religion, sect, sex, marital status, disability, political opinion, or any other status protected by law.

2.3 Harassment-free Workplace

Harassment has no place at Çimtaş and is not tolerated. Çimtaş employees work in a safe and professional working environment where virtue and skills are rewarded, and where diversity and trust are encouraged.

2.4 Employee Personnel Information

Personnel information of employees is not shared with third parties without the consent and knowledge of the employee, aside from information governed by legal obligations.

2.5 Avoiding Child Labor or Forced Labor and Human Trafficking

At Çimtaş, we do not tolerate child labor, forced labor, human trafficking or procurement of commercial sex acts. Çimtaş employees strive to ensure that Çimtaş does not retain suppliers, contractors or other business partners who engage in such activities.

3. ASSET AND INFORMATION MANAGEMENT

3.1 Intellectual Property Rights

At Çimtaş, we avoid the deliberate unauthorized use of patents, copyrights, trade secrets, brands, computer software or other intellectual or industrial property rights, and exercise due care and attention so as not to use in any way works under copyright without the consent of the copyright holder.

3.2 Information Management / Information Systems / Communication Tools

At Çimtaş, all legal records are kept as stipulated by law, and are administered in a timely fashion. Employees exercise due diligence in ensuring that reports declared by Çimtaş are truthful, acting with the awareness that all documents related to business belong to Çimtaş, ensuring that all records and said documents are kept in line with Çimtaş's procedures, and when necessary, destroyed according to the rules defined by law. No unlicensed software may be installed on company computers, software cannot be utilized beyond one's authority, and cannot be copied.

3.3 Asset Management

At Çimtaş, all kinds of tools, equipment, materials and fixtures are used in the best possible way, and all company assets are protected and used efficiently.

3.4 Security and Crisis Management

At Çimtaş, as a result of the emergency crisis management system that has been established for activation in the event of an act of terrorism, natural disaster or similar situation, continuity of work is ensured with minimum loss at times of crisis. In the event of terrorist activities, natural disasters or malevolent attacks, the necessary measures are taken to protect Çimtaş employees, information and information systems, factories and administrative installations.

3.5 Confidentiality

Çimtaş is fully aware of its liabilities according to all applicable data protection laws including Law no. 6698 on the Protection of Personal Data enacted by Turkish Republic as data responsible, and carries out its activities by fulfilling these liabilities. At Çimtaş, confidential information and data on our customers and suppliers is protected, and is not shared with anyone but the relevant authorities. Personal information on our employees is confidential and is not shared with anyone but those concerned.

Suppliers must be aware of the fact that data privacy is a fundamental human right hence are required to implement necessary security measures and adhere to the principles, foundations, and procedures outlined in all relevant data privacy legislation. To ensure the protection of personal data, Suppliers are obligated to accept and fulfill specific contractual obligations regarding this matter in the agreements they enter into with Çimtaş.

4. TRADE CONTROLS

At Çimtaş, in the event of products and technologies subject to export and import controls being transported and/or used, all relevant laws, regulations, company principles and practices are observed.

Suppliers must guarantee that their transactions adhere to the stipulations of all export licenses and relevant regulations. Suppliers handling products subject to export and import controls or sanctions are accountable for comprehending and adhering to pertinent laws, regulations, and company policies.

5. MONEY LAUNDERING

“Money laundering” refers to transactions in which persons or entities filter the financial proceeds of crime through the financial system in order to “clean” evidence of its illegal source in the past, or to portray it as if it was legal. At Çimtaş, we remain vigilant against any financial irregularities in payment forms.

Suppliers are strictly prohibited from involvement, either directly or indirectly, in any activities related to money laundering and are expected to adhere to all national and international regulations regarding money laundering and implement all necessary precautions to prevent such occurrences.

6. AVOIDING CONFLICTS OF INTEREST

The name, property and knowledge accumulation of Çimtaş, and the duty and position of the employee within Çimtaş, cannot be used for personal gain.

- Çimtaş employee and Suppliers are expected to avoid any conflict of interest including but not limited to: Directly managing a family member,
- Procuring from a company from which personal gain is exercised,
- Offering any form of advantage to a Çimtaş / Supplier employee leveraging their position, save for the gifts adhering to legal requirements and this Code of Conduct.

7. RULES REGARDING TRANSACTIONS FOR THE BENEFIT OF ONESELF OR ACQUAINTANCES

At Çimtaş and Suppliers, it is forbidden to provide unfair advantages to an employee, acquaintances or third persons by making use of one's title and authority.

8. RECEIVING AND GIVING OF GIFTS

It is forbidden for a Çimtaş employee and Suppliers to request any kind of personal benefit from, customers or third parties that may be perceived as improper, nor shall a Çimtaş employee offer benefits to third persons, or accept offers from such persons. When establishing relations with private or public persons or institutions that are looking to establish or continue a business relationship with Çimtaş or Suppliers, no gifts may be received or offered that may be perceived as an irregularity, and which may cause a relationship of dependency or may be perceived as such.

9. ZERO TOLERANCE OF BRIBERY

Bribery refers to a grant or promise of anything of value or any other advantage with the purpose of improperly influencing the activities of private or legal third persons. At Çimtaş, we show no tolerance of bribery. The consequences of bribery are heavy both for Çimtaş and the related individuals, and include legal and criminal liabilities.

Çimtaş and Suppliers shall comply with all applicable laws of the United States of America and of all other applicable jurisdictions regarding bribery of public officials and private sector employees, including without limitation, all provisions of the United States Foreign Corrupt Practices Act, the U.K. Bribery Act of 2010, and the U.K. Criminal Finances Act of 2017 (the "Acts"). Suppliers shall ensure subcontractors and lower-tier suppliers are aware of and comply with the Acts.

RESPONSIBILITIES OF THE EMPLOYEES

The Çimtaş Code of Ethical Conduct includes detailed information on how we carry out our work. Abiding by this code is the primary responsibility of all employees. In this respect, all Çimtaş employees have the responsibility to:

- Act in accordance with laws and regulations under any conditions,
- Read the Çimtaş Code of Ethical Conduct; and to know, understand, internalize and act according to the rules, principles and values included within,
- Learn the policies and procedures that are applicable to the company in general, and those specific to their work,
- Consult with his/her manager and the Ethical Committee in the event of potential violations involving him/herself or others,
- Immediately report possible violations of him/herself or others; to provide notifications of the subject in writing, either with his/her name or anonymously, to his manager and/or the Ethical Committee.
- Cooperate with the Ethical Committee in ethical investigations, and keep information

about the investigation confidential.

RESPONSIBILITIES OF THE ADMINISTRATORS

Çimtaş administrators, within the framework of the Çimtaş Code of Ethical Conduct, have additional responsibilities to those defined for the employees. Accordingly, the administrators are responsible for:

- Communicating the Code of Ethical Conduct to the employees,
- Setting an example and leading the employees in line with the ethical code,
- Supporting employees in communicating their queries, complaints and notifications related to the ethical code,
- Providing guidance on actions to be taken when consulted, taking into consideration any notifications made, and informing the Ethical Committee immediately when deemed necessary.

RESPONSIBILITIES OF THE HUMAN RESOURCES DEPARTMENT

The Human Resources department is responsible for providing training in the Ethical Code, informing employees, and communicating this to the employees.

RESPONSIBILITIES OF THE MEMBERS OF THE ETHICAL COMMITTEE

They are responsible for ensuring the confidentiality of complaints and notifications made within the framework of the Ethical Code, guaranteeing the timely, consistent and sensible investigation of all complaints and notifications, and taking necessary actions resolutely in the event of any violations.

RESPONSIBILITIES OF THE SUPPLIERS

Suppliers hereby acknowledge their agreement with the Çimtaş Code of Ethical Conduct and accept that Çimtaş reserves the right to conduct audits and may request relevant information and documentation to ensure compliance with the Çimtaş Code of Ethical Conduct. Such documents shall be provided to Çimtaş within two days of the request.

RESOLUTION OF NONCOMPLIANCE WITH THE ETHICAL CODE

Çimtaş can only take action if it is informed about the misconduct.

If Suppliers or Çimtaş employees find out or suspect that the company is in violation of the laws, regulations or ethical rules to which it is subject, they may communicate their concerns to the Çimtaş Ethical Committee by e-mail in writing, via the Committee's e-mail address.

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