

Küçüköğlü Holding

Code of Ethics

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1. MESSAGE FROM TOP MANAGEMENT

Dear Colleagues,

Our company, the foundation of which was laid as a family company in the automotive sector in 1985, is growing with your valuable contributions in line with our core values as a corporate group operating in many different industries these days.

In the light of our company mission and vision, we are among the leading companies in the sector by always aiming for the better and constantly improving ourselves in line with customer demands, within the framework of respect for people and the environment.

We take pride in continuing our activities for our company's growth and operating in different geographies. This situation makes many responsibilities such as new legal regulations, legislation, policies and procedures a necessity of our professional life. In this context, we have elaborated and reviewed our Code of Ethics in accordance with national and international regulations.

I am aware that, we, as the employees of our company, have been committed to the core values of our company and I would like to express my sincere thanks in this respect. In order to continue our activities, grow further and proceed in our position in the industry without compromising our quality and values, we undertake to continue our work hereinafter in line with our Code of Ethics. Adopting our Code of Ethics and acting in accordance with these will always be beneficial for us in the sector we operate where competition is at a high level. As the Board of Directors, in order to carry out our work in accordance with the laws, sectoral rules and our Code of Ethics; we will always be by your side and support you.

Kindest Regards,

Oğuzhan Küçüköğlü

Chairman of the Board of Directors

2. OBJECTIVE AND SCOPE

As Küçüköğlü Holding Group of Companies ("Küçüköğlü " or the "Group"), our mission is “to be a group that meets the expectations of the society, the environment and all stakeholders in the best way, and adds value to its employees with its sustainable growth, without sacrificing quality in its products and services by using its experience and know-how”. Our vision is, "to be a leading, reliable and reputable global company that adopts unlimited development as a principle in all sectors where it operates".

We conduct business in accordance with national and international regulations in the sectors we operate in line with our mission and vision. As Küçüköğlü, one of the keystones of our success since 1985 has been that we care about all our stakeholders to ensure that they continue their work in accordance with and adhering to our Code of Ethics (“Principles”).

Our Code of Ethics, which we have prepared on the basis of our values, serve as a guide for the responsibilities to be observed by all our employees. It is also very important for us that our valued stakeholders we conduct business with know our Code of Ethics and work in line with these principles. In case of any inconsistency between our principles and the legislation for any reason or if the legislation is stricter, we act in accordance with the legislation at all times.

It is very important that we are always aware of the fact that unethical behavior conducted by our employees, managers, customers, suppliers or other stakeholders can seriously damage Küçüköğlü's image and its position in the industry. In case of violation of the Code of ethics by our employees, suppliers and/or stakeholders, these individuals and/or institutions may encounter a sanction according to the level of the violation in accordance with the relevant legislative regulations and our Company policies.

As Küçüköğlü, we have an objective to create a sound Code of Ethics to make our principles the main element of company culture by means of increasing the effectiveness of the compliance structure in order to minimize the risks we may encounter in our activities.

The Code of Ethics prepared to this end focuses on national and international legislations, policies and procedures of the Group, the ethical principles, the contracts to which it is a party and the commitments made by it and therefore prevention of potential breaches, identification of the existing ones and taking rapid actions as well as outlining the situations contrary to the Ethical Principles are aimed.

3. DEFINITIONS

“Business Partners” is the gathering of more than one natural person or legal entities independent of each other in economic and legal terms to fulfill their contractual obligations.

“Code of Ethics” are the principles that Küçükoğlu employees are obliged to abide by within the framework of the values and rules adopted by the Group.

“Collective Bargaining Agreement” is defined as the agreement between the labor union and the employer union or the non-union employer to regulate the issues related to the issuance, content and termination of the service contract.

“Compliance Officer” is the person who is responsible for determining the framework of compliance activities, preparing and revising policies and procedures, taking preventive actions and observing these in Küçükoğlu Holding Group of Companies.

“Confidential / Private Information” is defined as sensitive and proprietary information that requires the protection of the Group's confidentiality, integrity or availability. Access to such information shall be restricted by laws or regulations and it can only be accessed by those holding the required permission and authority.

“Conflict of Interest” shall refer to any interest provided to employees, their relatives, friends, persons or organizations with whom they have a business relationship with, that affect or may affect their ability to perform their duties impartially, and the state of having any material or personal interest in these.

“Data Controller” will be defined as the natural person or legal entity responsible for determining the purposes and means of personal data processing and for the installation and management of a data recording system.

“Disciplinary Action” shall refer to the sanctions applicable to the employees by the Human Resources Department due to their acts against the Code of Ethics, applicable laws, rules, standards and attitudes set and implemented by Küçükoğlu Holding Group of Companies.

“Employee” shall refer to the staff, managers, personnel, temporary personnel and employees of the subcontractors, including all levels and acting on behalf of Küçükoğlu Holding Group of Companies.

“Ethics Committee” is the structure responsible for investigating and resolving notifications in case of violations of ethical rules and related practices within the scope of Küçükoğlu Holding Group of Companies Code of Ethics.

“Ethics” is a system formed by moral principles that affect the way people make decisions and lead their lives.

“Investigation/Enquiry” is the process of investigating, collecting information and interviewing the relevant persons regarding an unethical issue by authorized persons and/or units. The employees may face sanctions in accordance with the disciplinary regulation at the end of the process.

“Küçükoğlu Holding Group of Companies” shall refer to Küçükoğlu Holding and all its affiliated companies.

“Lean Production” is defined as a production system that bears no unnecessary elements in its structure and in which the elements such as error, cost, inventory, labor development process, production area, waste, customer dissatisfaction is minimized.

“Money Laundering” is defined as any transaction made in order to hide the illegal source of the revenues obtained within the scope of criminal activities and to show these revenues as if they were obtained from a legal source.

“Notice” shall be referred to as the communication of events that do not comply with ethical principles, with intra-Group practices or that are unlawful, to the authorities and/or units authorized to investigate these by keeping the personal data confidential or by disclosing them.

“Personal Data” shall refer to any information pertaining to an identified or identifiable natural person. In this context, not only information that provides a definitive diagnosis such as the name, surname, date of birth and place of birth of the individual, but also information about the person's physical, familial, economic, social and other characteristics are defined as personal data.

“Politically Exposed Persons (PEP)” shall refer to people in important public positions such as heads of state or government, senior politicians, senior government, judicial or military officials, senior executives of publicly owned companies, and officials of leading political parties.

“Retaliation” shall refer to the actions that cause material or moral aggrievement of the reporting person due to their reporting action.

“Sanction” shall refer to disciplinary penalties or commercial measures against employees or third parties for their behavior contrary to the policies of Küçükoğlu Holding Group of Companies, laws and the legislation.

“Sustainability” shall mean making human life permanent while ensuring the continuity of production and diversity. In other words, sustainability will be defined as the ability to meet our own needs without compromising the needs of future generations.

“Third Parties” are defined as any distributor, dealer, agent, consultant, representative, contractor, subcontractor or other person who can act on behalf of Küçükoğlu Holding Group of Companies.

“Zero Tolerance Principle” is defined as not bending the rules set by the Group in any manner but complying with all of them and applying the relevant disciplinary actions without a single exception in cases where these are not complied with.

4. OUR VALUES AND CODE OF ETHICS

4.1 Our Values

As Küçükoğlu Holding Group of Companies, we have been conducting our activities in accordance with the sectoral rules and the relevant local and international regulations, based on our values since 1985. We act in the light of our ethical principles in matters that cannot be clarified by the rules of the sector and legal regulations.

We can summarize our values that constitute our ethical principles under seven main headings as follows :

- Respect for People
- Integrity
- Occupational Safety
- Equality
- Transparency
- Reliability
- Respect for the Environment

We ensure unconditional customer satisfaction and we maintain transparent and fair relations with all our stakeholders in line with our values.

We add value to all our employees and contribute to their continuous development, diligently select social responsibility projects and take care of the society and the environment.

4.2 Our Code of Ethics

4.2.1 Respect for People

We fulfill our obligations towards our employees, stakeholders and the environment. We aim to teach people how to act together towards a common target and how to act, think and feel in this process within the meaning of Küçükoğlu culture in order to create teamwork.

Respect, Justice and Equal Opportunity

As Küçükoğlu Holding Group of Companies, we are aware of the fact that the basis of our industrial activities is constituted by people and we act within the framework of respect for human rights in our business processes. In this context, we take into account the United Nations Declaration of Human Rights and the relevant International Labor Organization ("ILO") Conventions and ensure that our Code of Ethics and related policies comply with the principles therein. Furthermore, while carrying out our activities, we adopt the understanding of

complying with the 10 principles¹ in the United Nations Global Compact on human rights, labor, the environment and anti-corruption.

We do not discriminate against our employees because of their age, language, religion, race, color, ethnicity, gender, belief, marital status, sexual orientation, title, political opinion, military status, health/disability status, and we treat them equally and fairly. We also apply this understanding in all processes such as employment, recruitment, promotion, termination of employment, reemployment, transfer, leave, wage and training. We furthermore adopt the Zero Tolerance Principle against all forms of harassment, mobbing, discrimination and violence.

We provide equal rights to each of our employees in all processes such as a healthy and safe working environment, the right to unionization and collective bargaining agreement, privacy of private life, education, wage policies, performance evaluation, assignment, job rotation and promotion.

We do not apply forced labor in our group. We do not allow child labor, slavery and human trafficking in our Company either and do not engage in business relations with any third party that does not pay attention to these issues.

As K   kođlu, we treat the parties with whom we have a business relationship with respect and in equality. In addition to this, our employees always act in compliance with legislative regulations while performing their duties in their job descriptions.

4.2.2 Integrity

As K   kođlu Holding Group of Companies, we keep the values of integrity and honesty as the priority in all our processes and business relations with our stakeholders and we always act pursuant to this approach.

Integrity and Responsibility

We provide timely, accurate, complete and understandable information regarding our Group's financial reports, strategies, investments and risk profile by observing the principle of transparency in our statements made to the public and to our stakeholders.

We perform all our business processes in accordance with local and/or international regulations and our Code of Ethics and expect all our stakeholders to assume equal responsibility.

Bribery and Corruption

As K   kođlu Holding Group of Companies, we have zero tolerance for bribery or all forms of corruption and conduct our business activities in accordance with national and international legislation/regulations (FCPA², UKBA³, etc.).

¹ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

² FCPA (Foreign Corrupt Practices Act)

³ UKBA (UK Bribery Act)

Bribery does not only cover cash payments made to any person or legal entity, but also includes the provision, offering and promise of all items of material or moral value that will have an impact on decisions related to commercial activities.

Within the scope of our Code of Ethics and the relevant policies, we do not pay, offer or even suggest bribe to local or foreign public officials and to other third parties under any circumstances. We expect all our employees, third parties with whom we conduct a business relationship and who take actions on our behalf to comply with the related obligations and all our stakeholders to act in accordance with the relevant regulations.

As K   kođlu, we are against all kinds of bribery and corruption, not only to comply with our Code of Ethics, but also to prevent the harm it may bring to our social values.

Anti-Money Laundering

As K   kođlu Holding Group of Companies, we conduct all our activities in line with the principles of transparency and accountability. In this regard, we act in compliance with all laws and regulations, as well as the high standards accepted worldwide, regarding the anti-money laundering and financing of terrorism. Otherwise, our Group and our employees may be subjected to serious sanctions and loss of reputation.

Since it is important for us that the third parties with whom we have a business relationship are diligent in this regard, we always make risk assessments both before and during the study. In this context, we only perform business operations with parties that acquire income from legitimate business activities, have a fine reputation in the market, and with whom we conduct due diligence studies.

Compliance with Sanctions and Embargoes

As an international organization, we act in accordance with all local and international regulations in the geographic locations where we operate and laws and rules regarding economic sanctions and export control regulations (sanctions applied by Turkey, the United Nations, the United States, European Union Sanctions or the obligations regarding the economic sanctions and export controls imposed by other jurisdictions). We also act in compliance with international conventions to which the Republic of Turkey is a party and we closely monitor the developments related to legislation. In cases where the legislation appears to be vague, we manage our business processes in accordance with the sectoral practice and our Group Code of Ethics.

In this regard, we make sure that the countries and persons with whom we have a relation with are checked regularly not only before the agreement, but also during the business relationship to see whether they have relations with the countries and individuals on the sanctions and embargo lists.

Conflict of Interest

As Küçüköğlü Holding Group of Companies, we are aware that we should not engage in any activity that will provide material/moral interest for ourselves and our relatives.

In this respect, we do not share any information that will provide interest to our families, customers, third parties and/or competitors by means of using the Group position or title for personal interest.

All employees will be required to share the situation with the Compliance Department and/or the Compliance Officer if they or someone else are exposed to situations that may be considered a conflict of interest and/or in the case there is any suspect for this.

- Matters that can be considered as conflict of interest are listed below, including but not limited to, and any action that will provide personal benefit can be considered as a conflict of interest. We do not enter into a debit/credit relationship with our colleagues, customers, suppliers and all other stakeholders.
- We do not share the confidential information of Küçüköğlü with our customers, suppliers, competitors and stakeholders.
- We inform our supervisor if our colleague and persons who are in the first degree decision-making position regarding the same business in the company in the position of a customer or supplier are our first-degree relatives.
- We do not become involved in a reporting link or a decision-making mechanism in the same organization with our relatives, including our spouse and third-degree relatives.
- If we hold shares in another company or participate in its investments, we will report this during our first start of job.
- We do not accept posts in any public or private organization other than our job at the Company, even out of working hours. We do not engage in any direct or indirect commercial activity, whether it is involved in the company's field of activity or not.

Competitor and Competition Relations

As Küçüköğlü Holding Group of Companies, apart from the limits permitted by the legislation, we do not make agreements with competitors, other persons and organizations that have the purpose of preventing, distorting or restricting competition directly or indirectly, or that cause / may cause monopoly / antitrust effect. We avoid behaviors that will constitute unfair competition, and we will comply with the provisions of local and international competition law in all sectors where we operate regarding the protection of competition. As a group, we support the efforts to establish a competitive structure targeted within the society.

We do not negotiate and exchange information with our competitors to determine the market or competition conditions together. We avoid any meetings and transactions that may lead to or qualify as such situations in other private or professional meetings and meetings with the associations, assemblies, chambers, professional associations, etc. that we participate in, in our capacity to represent Küçükoğlu. We do not engage in activities that will create the perception of insider trading and we follow the information which must be provided for our business through public channels and platforms.

Case Study 1:

Knowing that I am going through a financially constraining period, the Company customer offered to make a loan available for me. What should I do?

You should definitely refuse this offer, which creates a conflict of interest and can also be considered as corruption and inform the Compliance Department and/or the Compliance Officer accordingly.

Case Study 2:

Being the company's training officer, I am responsible for the selection of external instructors. The consultancy firm owned by my spouse wants to give a price quotation to our company. Is that possible?

It is possible, but in order to avoid a potential conflict of interest, you should report this to the Compliance Department and / or the Compliance Officer. The offer in question will be evaluated in accordance with the usual purchasing processes. However, you cannot take part in this process. However, you cannot assume any duties in this process.

Case Study 3:

I am responsible for the conduct of relations with the company's domestic suppliers. A catering company, from which I have received a price quotation, has also offered a significant discount for my daughter's upcoming wedding. What should I do?

In order to avoid conflict of interest or possible corruption acts, you need to distinguish between your work and private life correctly and establish a balance. For this reason, you should refuse this offer of the relevant supplier and inform the Compliance Department and/or the Compliance Officer of the related process accordingly.

Case Study 4:

I have learned that one of the CEOs of the company's suppliers was involved in a corruption incident. What should I do?

You should immediately notify the Compliance Department and/or the Compliance Officer. Suppliers should be expected to act in accordance with the ethical principles of Küçükoğlu Group.

4.2.3 Occupational Safety

As Küçükoğlu Holding Group of Companies, we create safe and healthy working environments in line with the principle of respect for people by making occupational safety and health our first priority and make this the common responsibility of all our Küçükoğlu Holding Group of Companies employees.

Safety and Health in the Workplace

As Küçükoğlu, we attach care to the health and safety of our employees. To this end, we follow and apply the relevant laws and international standards in the countries where we operate. We report all incidents that prevent the continuation of the activities to the official authorities without exceeding the legal notification period. During the on-site inspections carried out by the official authorities, we present all our work, records and documents related to occupational health and safety to the authorities in an open and transparent manner. We make use of consultants and external trainings when required to learn and apply the laws on occupational health and safety. We include activities that increase awareness about occupational health and safety through the intra-group trainings and audits.

Our target as a group is complete prevention accidents which may result in injuries, loss of limbs and fatality. To this end, we determine our occupational health and safety risks in all our processes and take our measures accordingly. We do not keep any objects or substances that pose a danger to the workplace or to the employees or materials that are illegal in the workplace. We, except for those who have doctor's reports, do not keep drugs, addictive substances, substances that restrict or eliminate mental or physical abilities at work. We do not work at the premises or remotely while under the effect of these substances. We observe environmental and occupational health and safety rules in our new investments and the new projects we will put into effect. We create our emergency teams, train them and raise awareness by all our employees making use of emergency drills with or without notice to be prepared for emergencies at all times.

4.2.4 Equality

As Küçükoğlu Holding Group of Companies, we establish honest and open business relations with all our stakeholders at an equal distance.

Our Relations with our Stakeholders

It is very important for us that the parties with whom we have a business relation with respect human rights and the environment, adopt anti-bribery and anti-corruption actions, prevent

money laundering and have policies in place, particularly related to human rights and act in accordance with national/international legislation.

As a group, we keep our communication channels with our stakeholders open and attach utmost importance to their opinions. We respect and protect the rights of our shareholders as defined by the law.

As Küçüköğlü Holding Group of Companies, satisfaction of our customers is one of our main priorities. We maintain our activities to meet the demands and requirements of our customers. We always make sure that our services and products are of good quality and use. We act in accordance with the rules of courtesy in our relations with our customers at all times. We take into account the complaints, requests and suggestions of our customers and show efforts to improve our processes.

Pursuant to this, we adopt the following principles in our relations with our customers.

- We do not take any action without the knowledge of our customers, even if this is in their favor.
- We forthwith respond to and treat our customers' questions and answers and try to solve problems in an equitable manner.
- We do not enter into any special business relations with our customers. We do not borrow from or lend money to our customers.
- We do not purchase goods or services from our customers at no cost or in return for a price less than their value.
- We treat all our customers equally, fairly, transparently and honestly.
- We act diligently in our communication with our customers, try to use an understandable language and avoid discourses that may cause misunderstandings.
- We inform our customers about the benefits provided by and risks/costs caused by the products and services offered to their side.
- We do not perform any transactions on behalf of our customers by proxy.
- We conduct a fair and transparent pricing process, taking into account the relevant laws and market conditions.
- We work together with our customers in financial constraint to find a solution that will serve as an advantage to both parties.

We are aware that our relationships with our customers have consequences that can directly have an impact on the image of Küçüköğlü.

4.2.5 Transparency

As Küçükoğlu Holding Group of Companies, we share all kinds of comprehensible, relevant, reliable and qualified information in a timely manner within the framework of confidentiality principles to all stakeholders of our Company.

Donation and Sponsorship

As a group, we attach importance to social development and perform our work in this context. We perform our donation activities within the framework of social responsibility without expecting any economic benefit or reward in return.

We assess all our donation and sponsorship activities in compliance with the laws, regulations and Group policies, and act in accordance with the principle of transparency in all our processes. We do not engage in donation or sponsorship activities which we deem to be inconsistent with our group values and/or to cause a conflict of interest.

Gifts and Entertainment

As Küçükoğlu, we do not accept any gifts, proceeds, aid, entertainment, special discounts, commissions or discounts that may have an impact on our commercial activities and decisions, and we do not make offers to anyone in this respect. As per the rules of courtesy, we show diligence to ensure that the gifts and entertainment we receive and/or give do not cause any misunderstanding, and we expect all our business partners to be diligent and to show care in this respect.

We make sure that the gifts we accept and give are transparent, accountable and at a reasonable level that does not cause misperceptions. This covers all kinds of gifts and entertainment activities that may be material and moral, and the principles to be considered are given below. Gifts and Entertainment;

- Should undoubtedly have a symbolic meaning,
- Should not be continuous,
- Should not in cash and cash equivalent form,
- Should not have an impact on the commercial activities and decisions of the company,
- Should comply with applicable laws and regulations,
- Should not be at a level to affect the image of the company.

As Küçükoğlu Holding Group of Companies, we are aware of the fact that the rejection of the types of offers indicated in certain situations can have a negative impact on customer relations in today's conditions where competition is tough. For this reason, offers of participation for free conferences, introductory meetings, trainings, etc. from third parties or our customers or

potential customers, organizations open to general participation, sporting and similar activities shall be accepted only with the approval of the Compliance Department.

All our employees shall be required to notify the Compliance Department and/or the Compliance Officer regarding the gifts received and/or offered within this context.

Case Study 1:

A good customer of the company is asking for my home address to send a surprise gift for the New Year/Religious Holiday. Can I share my address with this customer?

No. Since you will not be able to appreciate the value of the gift, you should kindly refuse the customer's request and notify the Compliance Department and/or the Compliance Officer accordingly.

Case Study 2:

If a supplier of the company wants to give a pen as a gift, should I accept it?

If the pen has a value within the limits specified in the company policies with the supplier's logo, it may be accepted. However, an expensive gift of a pen with a value over the reasonable limits should be kindly refused and the Compliance Department and/or the Compliance Officer should be notified accordingly.

Case Study 3:

My plane landed with a delay of 3 hours and I am about to miss a business meeting that is important for the Company due to the visa queue. One of the customs officers implies that he can make things easier for me in return for a fee. What should I do?

Since this will cause you to be involved in an offence of bribery, you should kindly refuse the officer's request and notify the Compliance Department and/or the Compliance Officer accordingly.

Political Activities

As Küçükoğlu Holding Group of Companies, we stand to all political views at an equal distance. We are aware of the fact that politically exposed persons (PEP), public officials and civil servants equipped with certain powers and those around them pose a high risk due to their position and influence regardless of whether they are of Turkish or foreign origin. The same will be true for political parties, sports federations or charity organizations. For this reason, we do not make donations to political parties and/or Politically Exposed Persons. However, we do not interfere with the political views and activities of our employees.

All our employees are aware of the fact that they should not engage in political activities during working hours, that they should not use the company resources (company title, e-mail, computer, telephone, vehicle, etc.) for this intention, and that they should avoid any situation that cause conflict of interest in their current duties and responsibilities due to the political activities they are involved in.

Communication

As Küçükoğlu Holding Group of Companies, respect for people, which is one of our core values, is very important for us. We pay particular attention to this issue both in our internal and external communication.

Making a statement to any media organization within Küçükoğlu shall be subject to the authorization of the Board of Directors. We use social media consciously as the requirement of the technological age. In addition to the benefits provided by social media to our business activities, we are also aware of the fact that if not used carefully, it can seriously damage the image of Küçükoğlu.

All our employees are aware of the fact that they should not disclose personal opinion about the Group to the public, except for those who are authorized to do so. We always provide honest and reliable information to the public and in the social media within the framework of rules of courtesy.

4.2.6 Reliability

As Küçükoğlu Holding Group of Companies, we endeavor to fulfill our duty against our stakeholders in the best manner, on time and as requested in all our relations and activities.

Confidentiality of Information

As the Group, we keep the confidentiality and integrity of our knowledge and resources among our most fundamental targets for competitive and sustainable growth. We attach importance to the confidentiality of all our company, customer and stakeholder information and do not share this information with third parties. We do not ask for information other than what we need to perform our work.

Being aware of this, we do not allow the unlawful processing of personal and commercial data of our employees, customers and business partners and the access of unauthorized persons to such data, and we take all kinds of technical and administrative measures to ensure the required level of security for the protection of personal data. We show the necessary care and diligence to maintain the confidential information carefully so that it is not disclosed.

The use of new data management technologies (such as cloud, big data, etc.) and digital applications (social networks, e-mail, etc.) brings together new risks such as cyber security

risks. As Küçüköğlü Holding Group of Companies, we are prepared against the threats that may arise from such risks and attempts to damage the integrity of data. In this respect, we pay attention to careful and appropriate use, access, storage, disclosure, transfer and deletion of all data, including online data.

Even if our employees quit their duties, they are obliged to protect the confidential information they have acquired in accordance with their duties at Küçüköğlü even after they leave Küçüköğlü.

Case Study 1:

A customer is asking for information on the sales and order figures of another customer of the Company and promises to increase the volume of its work with our Company in return. What should I do?

Since it is strictly prohibited to share confidential information about customers or other affiliated parties with unauthorized persons outside the Company, you must reject the request for information and notify the Compliance Department and/or the Compliance Officer accordingly.

Case Study 2:

I am worried about not getting a premium since I haven't reached my annual sales target. In the case I obtain some necessary confidential information from a friend who works in the relevant information to ensure that one of our important customers can win the tender filed by this institution and share if I share this important information with my client, I can enable him to increase the volume of business with our Company as well as reach my targets. Should I call a friend working in the relevant institution for this?

No. Obtaining any confidential information in order to provide personal interest is strictly prohibited. To obtain this information illegally and disseminate it within the Company is against our Code of Ethics. Sharing and detection of this information may result in necessary sanctions.

Protection of Personal Data

As Küçüköğlü Holding Group of Companies and in our capacity as the data controller, we undertake to all our employees and business partners that the personal data obtained in the manner specified in the contracts will be recorded, stored, rearranged, shared with the institutions authorized to request the personal data if required and may be transferred and processed to third parties at home or abroad under the conditions stipulated by the LPPD within the scope of our business relations and/or within the framework of the purpose that requires such data to be processed as limited to our business relations with our employees, and in a proper manner linked to this purpose.

Responsibilities of Those Leaving the Company

No approval shall be granted for conducting any sales, contractor, consultancy, brokerage, representation, dealership or similar business relations with our former employees who quit their position in Küçüköğlü and set up their own business or become partners to other companies except in exceptional circumstances requiring the approval of the Board of Directors of Küçüköğlü Holding, until a period of 2 years has expired after such employees have left the company.

An employee leaving the company to start a new job in a senior management or a decision-making position in another company is also an issue that we should pay attention to. It will be necessary to act within the framework of the interests of the Group, to comply with moral and ethical rules and not to allow situations where a conflict of interest may be in question before and after the process.

When our employees leave the Company, they are aware of the responsibility that they must not share their confidential information with third parties and must submit to the Company any copies of the information and documents they had received during office of work.

Use of Private or Public Security Forces

Measures have been taken to ensure that our security services respect human rights and that legal sanctions are in accordance and consistent with international norms and standards. Security personnel (employed and/or contracted) are trained, independently identified and investigated with regard to complaints about human rights standards and security procedures. We exercise due diligence to ensure that we do not participate in, facilitate or profit from human rights violations committed by public security forces.

Intellectual Property Rights

In order to secure the intellectual property rights of newly developed products, processes and software, we ensure that legal processes are initiated and completed on time. We avoid – knowingly – unauthorized use of patents, copyrights, trade secrets, brands, computer programs or other intellectual and industrial property rights belonging to other institutions.

Fake Parts

Küçüköğlü Holding companies, all products and services comply with the quality and safety criteria determined by contracts and provide original production parts supply. It complies with the articles brought by all laws and regulations. It has processes for detecting counterfeit parts and materials and, if detected, determines the materials and applies legal sanctions to the relevant supplier.

4.2.7 Respect for the Environment

As Küçükoğlu Holding Group of Companies, we perform economic development and progress on an ecologically acceptable basis and as a requirement of our responsibility towards future generations. Furthermore, it is our general principle to try to keep environmental awareness alive in terms of social responsibility by means of fulfilling the requirements of the legislation regarding environmental management.

Our Responsibilities Towards the Environment, Society and Humanity

As Küçükoğlu Holding Group of Companies, we monitor and apply all local legislation regarding environment. We take care to protect our natural resources in all our activities and in this context, we work with a sustainable business model to minimize their impact on the environment in line with the principle of lean production in our operations.

It is our intention that our operations add value to all our stakeholders in terms of environmental, social and economic matters. We act diligently to reduce our carbon footprint with energy saving and efficiency, to manage our waste in line with the zero-waste principle by means of using raw materials efficiently and to minimize our water consumption. Pursuant to this, the consumption of raw materials that harm the environment will be reduced and the highest level of recycling shall be achieved in our Group.

We separate and dispose of all our waste produced during our activities in accordance with the legislation. During our operations, we take measures for the adverse situations by determining the negative environmental aspects and their impacts on the air, water, soil and animals. We regularly monitor our occupational health and safety and environmental performance with key indicators. We adopt and implement a unified management system in accordance with international standards for the safe operation of Küçükoğlu Holding Group of Companies as well as for the protection of the environment, customers and the society.

Values constituting the basis of our sustainability principle:

Value for people: We carry our experience and knowledge from the past to the future by combining the long-established family business with the power of institutionalization.

Value for the sector: We create value by merging the feedback we receive from our business partners with our R&D and innovation power.

Value for the environment: We work to minimize the impact of our operations on the environment by making use of a sustainable business model.

Value for the future: We make use of natural resources effectively within the scope of our sustainable business model. Pursuant to this, we reduce the consumption of raw materials such as metal and plastic.

Land, Forest and Water Rights and Forced Eviction

Land, forests and water resources are critical to the health of ecosystems and the sustainable utilisation and protection of these resources is fundamental to our policy. Through its activities, our Company has ensured that it does not participate in the offence of displacement of persons from their own lands in any way.

5. REPORTING OF UNETHICAL SITUATIONS

This guide has been issued in line with the Code of Ethics of our company, and it is under the responsibility of all Küçükoğlu employees to report to the authorities of any situation constituting contradiction to this guide.

In this respect, those who suspect or witness a breach of ethical principles in the work environment should immediately report this issue to the Compliance Department and/or the Compliance Officer.

All employees or stakeholders of Küçükoğlu can report any such incidents they witness or suspect anonymously as follows.

Küçükoğlu Ethics Line No: (0850) 352 1496

Website: <https://kucukoglu.etikmerkezi.com/>

Alternatively, unethical incidents may be reported directly to line managers, Compliance, Human Resources or Internal Audit Departments.

In the case of violation of Code of Ethics rules and/or Group policies and procedures, employees may encounter various disciplinary sanctions, including termination of service contracts.

As Küçükoğlu, we assume the responsibility to protect the anonymity of the persons who report and during the process of investigation. As a group, we show zero tolerance for retaliation against those who report and apply the necessary sanctions.

6. REVISION HISTORY

This document has entered into force as of date Compliance Department shall be responsible for the execution and updating of this document.