

GEMAK GROUP COMPANIES CODE OF ETHICS AND HUMAN RIGHTS POLICY

1. Purpose:

The purpose of this policy is to describe the ethical values of Gemak Group companies and the respect we show for basic human rights and the value we devote to our employees.

2. Scope:

As Gemak Group companies, we expect all our companies to act in accordance with Code of Ethics and Human Rights Policy. This policy covers our basic principles of ethics and human rights. Code of Ethics and Human Rights Policy cover;

- Managers and employees of Gemak Group companies,
- Subsidiaries and affiliates and their employees,
- Persons and organizations (business partners) working on behalf of Gemak Group companies, including companies we outsource services, consultants, lawyers, external auditors.

This Policy;

Is an integral part of the Environment, Occupational Health and safety and Human Resources policies approved by the board of directors and all related documents.

3. Descriptions:

In this section, special terms and phrases, concepts, abbreviations that are mentioned in policy are briefly explained.

Gemak Group companies: includes all Gemak group companies.

Document: all types of procedures and written text where policies, regulations, procedures and business processes of Gemak Group companies are written and created in a way that it is accessible to the relevant employees.

Employee: refers to the staff of Gemak Group companies.

Service provider: the company from which Gemak Group companies receive and/or provide services (suppliers, sub-employers, business partners, customers, etc.) and its staff.

4. Management Responsibility:

Human Resources and Industrial Relations Directorate: The Human Resources and Industrial Relations Directorate are responsible for the preparation, development, and implementation and updating of this policy. The Directorate of human resources and Industrial Relations evaluates this policy in terms of its timeliness and development requirements when necessary and makes recommendations to the Board of Directors. In addition, this unit is responsible for preparing policy-related training documents and providing training to employees and delivering orientation programs to new employees.

Employee: Gemak Group companies adhere to the policies, regulations and procedures, comply with them, and work in accordance with the applicable legislation, if there is a behavior, activity or practice contrary to this document and responsible for issuing notice as specified in the last paragraph of 6th article of this policy.

Foreign Service Companies and Business Partners: companies and business partners from which services are outsourced must comply with the policy principles and other relevant regulations, and cooperation with persons and organizations that do not comply with these terms is terminated. Human rights are expected to be respected when doing business with companies, sub-employers, turnkey business relationships, suppliers, customers, joint ventures and other partners from where we receive

services for all types of outsourcing. It is essential that the implementation principles of this policy and compliance audits are carried out.

Quality Systems: publication of the prepared document on the company's document server is the responsibility of Gemak Group Quality Systems unit.

Corporate Communication Department: the internal distribution of the prepared document is under the responsibility of the Corporate Communication Department of Gemak Group companies.

5. References and annexes:

T.İK.001_ Anti-Bribery And Corruption Instruction

6. Implementation:

As Gemak Group companies, we attach importance to all our employees' rights by adopting the international declarations, principles, contracts and principles to which our country is a party, especially the Human Rights articles specified in the Constitution.

In order to support the policy, we develop the necessary working methods to create a working environment where human rights are respected and to avoid activities that directly or indirectly violate human rights.

As Gemak Group companies, we take care to implement approaches that will allow us to comply with the relevant legislation of the countries in which we operate/demonstrate in all our processes.

For this purpose, as Gemak Group companies;

- **Accuracy and integrity:** accuracy and integrity take precedence in all our business processes and relationships. We act with integrity and accuracy in our relationships with employees and all our stakeholders.
- **Our legal responsibilities:** we carry out all our existing activities and transactions at home and abroad according to laws of Republic of Turkey and international law and provide accurate, complete and understandable information to legal regulatory agencies and organizations in a timely manner.
- **Our social responsibilities:** during conducting all activities and our operations, we fulfill our obligations at an equal distance to all kinds of public institutions, civil society organizations and political parties without any expectation and advantage with a sense of responsibility.
- **Confidentiality:** Information for Gemak group of companies is one of the most important assets. In this direction, the effective use of information, correct sharing and ensuring the confidentiality, integrity and accessibility of information within the limits of authority in this process are the common responsibility of all our companies and employees.

Confidential and private information includes information that may cause a competitive disadvantage belonging to the Gemak group of companies, trade secrets, financial and other information that has not yet been disclosed to the public, information about personnel rights and information within the framework of "confidentiality agreements" concluded with third parties.

As Gemak Group employees, we take care to protect the privacy, private and personal information of our customers, employees and other related persons and organizations with whom we work. We protect confidential information about the activities of the group companies, use this information only for the purposes of Gemak group; we only share this information with interested parties within the specified powers.

For us, it is absolutely unacceptable to obtain any commercial interest (insider trading) by leaking any confidential information belonging to the Gemak group of companies from the inside. As we leave our company, we don't take out confidential information and documents that we have because of our duties, as well as projects, regulations, etc.

- **Accepting and giving gifts:** Our implementation details have been determined in our Gemak group of companies Anti-Bribery and Corruption Policy related to this issue.
- **Our responsibilities related to our employees:** We take care to treat our employees equally by providing equal opportunities without discrimination on the basis of religion, language, race, age, color, nationality or social origin, gender. In our group, human resource selection, recruitment, placement, training, remuneration processes are based on qualifications, performance, skills and experience.

As Gemak Group companies, we are sensitive to providing our employees with equal pay and competitive opportunities in market conditions in accordance with our principle of "equal pay for equal work."

We are committed to providing our employees with a safe and working environment free from all forms of harassment, abuse or violence.

We attach importance to strengthening health and safety in the workplaces in which we operate.

We support freedom of collective bargaining within the framework of trade unions recognized and authorized by law.

We do not tolerate forced labor.

We certainly do not employ child labor within Gemak Group companies.

We do not discriminate informally in the workplace, we respect differences.

In our workplaces, we never allow the use of bad language and psychological harassment . In Gemak culture;

- ✓ Regardless of the stress we experience, we use our emotions and voice control, we always filter our emotions and words,
- ✓ Even in tense moments, we don't break our style and approach issues with empathy,
- ✓ We provide our communication respectfully, modestly and constructively so as not to adversely affect the other party,
- ✓ We are adhered to honesty, business discipline, diligence, positive science and we never do intrigue and gossip.
- ✓ Our management style is participatory, fair, respectful to people and appreciates differences.
- ✓ We are a team committed to ethical values and laws, acting in the same direction as the common mind.

We pay attention to the inclusion of human rights practices in internal communication channels and training programs within Gemak Group companies.

We develop regulations in accordance with Occupational Health and safety legislation and attach importance to raising awareness of our employees in this regard.

In addition to providing our female employees with the opportunity to work on equal terms, we provide equal opportunities for promotions, appointments and changes in positions.

- **Our responsibilities to our competitors:** We compete only in areas that are legal and ethical, and we avoid unfair competition. We support efforts to ensure a targeted competitive structure within the community.
- **Our responsibilities to our suppliers/business partners:** We act fairly and respectfully as expected from a good customer, and we take the necessary care to fulfill our obligations in a timely manner. We carefully protect the confidential information of our business partners and the individuals and organizations we do business with.
- **Our responsibilities to society and humanity:** The protection of democracy, human rights and the environment; education and charity, the elimination of crime and corruption are very important for us. We focus on continuous and sustainable development by creating resources through quality and efficiency. We act sensitively as a pioneer in social issues with the awareness of being a good citizen; we try to play a role in non-governmental organizations, in public interest services, in charitable activities on these issues. We are sensitive to the traditions and cultures of Turkey and the countries in which we conduct international projects. We do not provide or accept bribe or products and services as gift etc. at a price exceeding the purpose.
- **Our responsibilities on behalf of “Gemak group:”** We anticipate, meet and exceed the expectations of all our very valuable customers with our very valuable experts. Our business partners, customers and other stakeholders trust us with our professional competence and integrity. We try to keep that reputation at the highest level.

We offer our services in accordance with company policies, professional standards, commitments and ethical rules, and we make the necessary dedication to fulfill our obligations. We take care to serve in areas where we believe we are professionally competent and will be, and we aim to work with customers, business partners and staff who meet the criteria of accuracy and legitimacy. We do not work with those who damage community morality and harm the environment and public health.

In public and in areas where audiences think we speak representing our company, we express only our company's views, not our own.

When faced with complex situations that may put Group companies at risk, we first consult the appropriate personnel following the appropriate technical and administrative consultation procedures.

In social networking sites, blogs, dictionaries, forums, e-mail groups, we avoid statements that give the impression that they are shared by third parties on behalf of the Gemak Group.

Information assets provided by the company must be used for business purposes. These information assets include hardware (desktop / laptop, terminal, portable data storage media, printer/fax/copier devices, etc.), software (all software installed on clients and servers), service (e-mail, internet access, network resources) and company data components.

All Gemak Group employees consider all issues contrary to this policy are obliged to notify the issue via etik@gemak.com address. Those who violate Business Ethics Rules, company policies and procedures, will be subject to various disciplinary sanctions that may reach the degree of being asked to leave their jobs if necessary. Disciplinary sanctions will also apply to people who approve, direct or have knowledge of inappropriate behavior and actions that cause violation of the rules and do not make the necessary notification properly.