
GLOBAL ETHICAL PRINCIPLES and CODE OF CONDUCT POLICY



KAZANCI HOLDING

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INTRODUCTION

In line with our organizational goals We recognize the importance of a consistent, effective and transparent communication model to achieve global success. Therefore, we have created a comprehensive Global Ethical Principles and Code of Conduct Policy to communicate with all our stakeholders in an open, transparent and reliable manner. This policy has been developed to ensure that all our employees and business partners act in accordance with our ethical values and business principles.

1. PURPOSE

With this policy, we determine the principles regarding the “Global Ethical Principles and Code of Conduct” that our company adopts and applies in our company activities and in our relations with domestic and international public institutions and the private sector. This policy is an integral part of our company's Global Corporate Compliance Program together with domestic and international regulations aimed at ensuring an honest, transparent and ethical business environment and in line with our company's other policies.

2. SCOPE

This policy covers managers and employees in all countries where our company operates.

The Rules that suppliers providing services for our company must comply with are included in our “Global Supply Chain Policy”.

3. MAIN PRINCIPLES

- Our Global Ethical Principles and Code of Conduct Policy has been established to guide our managers and employees in our domestic and international business activities, with public institutions and the private sector.
- Our Global Ethical Principles and Code of Conduct Policy is based on the global ethical in the United Nations Global Compact. For the cases that are not explicitly stated in this document, these principles shall guide for the practice.
- Our employees are expected to apply the basic principles set set forth in this Policy in all their relations and business activities to uphold the reputation of our company and our shareholders.
- Senior management is responsible for leading our employees to comply this policy, in addition to the regulations of the countries in which the Company operates.
- Our employees are obliged to comply with this policy -in addition to the regulations of the countries in which we operate.
- In situations and conditions not covered by this policy, our employees act with diligence and dedication and consult Compliance Department for an opinion before taking action for cases that are questionable under this policy.

4. MAIN VALUES

Our company is committed to the following principles and values:

- Respect and trust
- Solidarity
- Courage
- Agility
- Competitiveness
- Entrepreneurship
- Sustainable success

In addition to the basic principles and values mentioned above, our Company prioritizes the following principles and values in terms of the implementation of our Global Ethical Principles and Code of Conduct Policy:

- Integrity
- Transparency
- Accountability

5. ETHICAL PRINCIPLES AND CODE OF CONDUCT

5.1. Responsibilities to Society

Our company operates as part of a corporate structure that is aware of its social responsibilities, complies with domestic regulations, supports fundamental human rights within the legitimate limits of being a commercial enterprise, and gives due importance to health, safety, security and environmental issues.

Our company acts sensitively to domestic and regional traditions and cultural structure in the countries where we operate.

Our Company regards the protection of society and individuals and their social, economic and cultural development as a primary and indispensable objective.

Our Company prioritizes social responsibility and human rights, acting as a pioneer in developing innovative solutions.

The details of our company's responsibilities and guiding principles are included in our "Global Social Responsibility Policy".

5.2. Responsibilities to Customers

Our company serves to our customers in the most accurate way and timely manner in line with the needs and requests with a proactive approach.

Our company treats our customers with respect, courtesy, fairness and equality.

Our Company acts with the principle of honesty in the relation with our customers, protects their rights and considers their objections and requests.

Our Company makes only achievable commitments in all its interactions and communication with our customers, avoiding any misleading situations.

Based on the principle of consumer protection, our Company evaluates the opinions, requests and complaints of consumers and takes these opinions, requests and complaints into account in our decisions.

When any problem occurs, our company aims to eliminate the problem in the fastest way possible and to provide the best service.

5.3. Responsibilities to Competitors

Our Company competes within the framework of fair competition conditions in the markets in which we operate.

Our company manages our activities by promoting competition based on product performance, development and service quality.

Our Company avoids unfair competition in our activities and complies with all regulations and decisions of competent authorities regarding the protection of competition.

5.4. Responsibilities to Shareholders

Our Company aims to create sustainable value for our shareholders.

Our Company acts within the framework of financial discipline and accountability, and manages our resources and assets with efficiency and economy.

Our Company provides with timely, accurate, complete and understandable information to our shareholders regarding on financial statements, strategies, investments and risks.

Details of our Company's responsibilities towards our shareholders are included in our "Global Shareholder Engagement Policy", which is under the responsibility of the Corporate Governance and Sustainability Department.

5.5. Responsibilities to Suppliers/Business Partners

Our Company treats our Suppliers/Business Partners fairly and respectfully, and make every necessary effort diligence to fulfill our obligations on time within the framework of good faith rules.

Our Company uses objective criteria to select of suppliers and business partners and ensures to be in business relations with parties that meet all legal obligations.

Our Company fully fulfills its obligations regarding the storage of data of real and/or legal persons with whom it has business relations with.

5.6. Responsibilities to Employees

Our company values the mutual respect and trust among employees in the working environment. Our Company prioritizes creating a fair working environment for all employees. To this end, provides fair working conditions, to employees, ensures equal opportunities, and protects their legal Our company stand against discrimination and ensure fairness in recruitment, promotion, and training processes., Additionally our company encourages active participation of employees to workplace improvements and decision-making processes.

Our company actively promotes a work environment based on the principle of full equality of opportunity, condemning all forms of discrimination such as (but not limited to) language, religion, race, color, gender, ethnic origin, appearance, disability, economic status.

Our company is completely against any behavior that violates ethical principles, including abuse, physical or verbal harassment, aggressive, humiliating, discriminatory and undefined behaviors that may adversely affect the lives, physical and psychological integrity of employees.

5.7. Responsibilities to Public Institutions and Organisations

Our company operates in full compliance with the laws in the countries where it operates. Acts in accordance with the rules of cooperation, ethics and transparency in its relations with public institutions.

In order to protect its reputation and reliability, our Company ensures that all records are kept accurate, reliable reported and secured in accordance with with domestic and international laws.

Our company employees who communicate with Public officials or Private Sector managers are obliged to comply with local laws and company policies.

Our employees must inform compliance officers, their senior managers and the Compliance Department of any bribery and facilitation payment requests they may receive during the communication process, in order to achieve their business objectives.

6. ETHICAL PRINCIPLES

6.1. Conflict of Interest

Conflict of interest refers to situations where an employee's personal interests, directly or indirectly, may prevent their ability to make decisions, conduct evaluations and/or perform their professional responsibilities in the best interests of the Company.

Conflict of interest situations may cause decisions that prioritize individual interests resulting in harm to the Company or prevent the fulfilment of professional responsibilities.

The resources provided by our company for our employees should only be used for business-related tasks.

Our employees are obliged to avoid personal interests, situations that may be perceived as conflict of interests.

Comprehensive information and explanations on conflicts of interest are available in our "Global Conflicts of Interest Policy" under the responsibility of the Compliance Department.

For questions regarding conflicts of interest, contact the Compliance Department.

6.2. Gifts and Hospitality

Our Employees may use gifts and/or hospitality to establish and enhance business relations for the Company; however, it is important that gifts and hospitality are received and/or given in accordance with certain rules.

Gifts are defined as any items that are accepted or given directly or indirectly, with commercial value, including promotional or advertising items belonging to the Company or any stakeholders or business partners the Company has a business or potential business with.

Hospitality includes, but not limited to, all kinds of accommodation, travel, catering, transport, seminars and other events.

Gifts and hospitality should not be considered as personal interest by any of our employees. Each offer or acceptance of gifts and hospitality should be evaluated and decided in detail.

Details regarding the rules, limits and approval rules for accepting and offering gifts and hospitality are included in our "Global Gifts and Hospitality Policy" under the responsibility of the Compliance Department.

For questions regarding gifts and hospitality, contact the Compliance Department.

6.3. Export Controls and Trade Sanction

Our Company implements a high level of risk management in compliance with national and international sanctions.

In order to manage the risks related to sanctions, our Company monitors domestic and international developments, avoids commercial relations that may cause violations and cooperates with competent authorities to take preventive measures.

Our Employees are responsible for working in full compliance with the Company's policy regarding sanctions.

Details on the scope of export controls and sanctions rules are contained in our “Global Export Controls and Trade Sanctions Policy”, under the responsibility of the Compliance Department.

For questions regarding Export Controls and Trade Sanctions, contact the Compliance Department.

6.4. Anti-Bribery and Anti-Corruption

Our Company adopts the principle of conducting its activities in compliance with the domestic and international regulations on anti-bribery and anti-corruption and integrity commitments in force.

Our Company prohibits any form of Bribery and/or Corruption attempts, including payments to facilitate and/or expedite operations, even if not defined as an act contrary to the laws of the countries operated in.

Our employees are responsible for ensuring their actions on behalf of the company, are complied with anti-bribery and anti-corruption laws and company policies. In addition, our employees are obliged to reject requests for bribes and/or facilitating payments requested from them in order to expedite and/or facilitate the activities they carry out, and also obliged to report the situation to their senior manager, compliance officers and the Compliance Department.

Details on anti-bribery and anti-corruption rules are included in our “Global Anti-Bribery and Anti-Corruption Policy” under the responsibility of the Compliance Department.

For questions related to Anti-Bribery and Anti-Corruption issues, the Compliance Department is contacted.

6.5. Donations and Sponsorships

Our Company supports donation and sponsorship activities for social and environmental goals in the countries where it operates.

Donation activities with health, education, environment, humanitarian and cultural purposes that are considered to be in line with the above-mentioned purpose may be supported by the Company in accordance with specific rules.

Sponsorship activities that promote and strengthen our company's marketing strategies and our company's brands are evaluated and may be supported by our company in accordance with specific rules.

Our Company ensures that all donation and sponsorship activities comply with applicable domestic and international regulations and relevant company policies.

In accordance with the rule of “transparency” in our Company's activities, the Company defines the approvals that must be obtained before donation and sponsorship plan, and provides information about donations and sponsorships that should not be conducted.

Our Company refrains from engaging in any donation or sponsorship activities that may violate laws, damage its corporate reputation and brand value, or cause conflict of interest.

Details on donation and sponsorship rules and approval system are included in our “Global Donations and Sponsorships Policy” under the responsibility of the Compliance Department.

For questions related to Donations and Sponsorship, please contact the Compliance Department.

6.6. Protection and Processing of Personal Data

The main purpose of the protection and processing of personal data is to provide information about the personal data processing activities conducted by the Company in accordance with the law and the systems adopted for the protection of personal data. Additionally, it aims to determine the procedures and principles to be followed by data processors due to the relationship with the Company and to ensure transparency to the persons whose data is processed.

The rules that our Company should primarily apply in all data processing activities such as data collection, transfer and modification are included in our “Global Personal Data Protection and Processing Policy” under the responsibility of the Compliance Department.

For questions regarding the Protection and Processing of Personal Data, contact the Compliance Department.

6.7. Protection of Occupational Health and Safety

Our company performs its all activities in accordance with the occupational health and safety rules.

Our company prioritizes to raise awareness on occupational health and safety by providing trainings.

Our company implements measures to minimize work environment risks and improve processes.

Our company provides a healthy and safe work environment for employees.

Our employees act in accordance with the rules and instructions set for this purpose and take the necessary measures.

Our employees do not keep any item or substance in the workplace that poses a danger to the workplace and/or workers or that is illegal.

Our employees intervene as shown in the trainings as a result of a possible occupational accident and convey accurate information for impartial reporting.

Our employees participate in occupational accident drills in accordance with their own work areas.

Comprehensive information and explanations on OHS are included in our “Global Occupational Health and Safety Policy” under the responsibility of the Corporate Governance and Sustainability Department.

6.8. Conservation of Environment

Our company avoids violations of environmental rules that may harm the health and rights of our employees, customers and residents of the region in which it operates.

We act in a way to minimize the negative effects of our activities on the environment in all business areas of operation operate and takes measures to prevent environmental pollution.

Our employees act with environmental awareness in every activity they perform according to sustainability principles carry out.

Our employees are committed to act in accordance with the principles of sustainability and environmental sensitivity in all their activities.

Comprehensive information and explanations on the environment are contained in our “Global Environmental Policy”, which is under the responsibility of our Corporate Governance and Sustainability Department.

6.9. Confidentiality and Protection of Internal Information

Our Company ensures confidentiality of non-public information of our customers and business partners. This information will only be used for intended purpose and not be shared with third parties without obtaining the necessary permissions.

Our employees are responsible for protecting the confidentiality of our company's financial and commercial secrets, competitive power, and information in agreements with business partners.

6.10. Social Media and Communication Tools

Equal treatment policy to media organisations and maintenance of an impartial attitude has been adopted.

Our Company's Corporate Communications Department handles and finalizes media organizations' statements, opinions and requests, news studies and interview requests.

Our Company avoids -statements that may damage our corporate image or are incompatible with our corporate values; and does not use discriminatory, hateful or offensive language.

Our employees must avoid any situation that could adversely affect the reliability and reputation of the organization in their media relations. Confirming the accuracy of the data is a priority before any media communication or statement, in order to protect Company's reputation.

Comprehensive information and explanations on social media management are included in our "Global Corporate Communications Policy" under the responsibility of our Corporate Communications Department.

6.11. Compliance with Competition Law

Our employees, managers and business partners are obliged to refrain from entering into anti-competitive agreements, avoid engaging in concerted practices with competitors, refrain from acting in line with the decisions of anti-competitive undertakings of associations, not to share information with our competitors that may cause harm in terms of competition law, and to show the necessary sensitivity to prevent abuse of dominant position.

Details on competition compliance rules and approval system are included in our "Global Competition Law Compliance Policy" under the responsibility of our Legal Department.

7. REPORTING OF ACTIONS NOT IN COMPLIANCE WITH ETHICAL PRINCIPLES AND CODE OF CONDUCT

All our company employees shall be subject to our disciplinary policy in case of non-compliance with applicable regulations and other policies.

Deficiencies or exceptions in our policy will be communicated and evaluated by the Compliance, Human Resources, Internal Audit, Legal Departments and/or the relevant committees of our company, depending on the issues.

Reporting of actions that are not in compliance with the Ethical Principles and Code of Conduct should be made to the following communication channels:

- Email: etik@aksa.com.tr,
- Ethics Hotline: 0 850 511 11 12

8. POLICY-RELATED QUESTIONS AND COUNSELLING

In order to ensure that business planning is carried out in accordance with the Policy, questions and consultancy requests can be sent to the Compliance Department e-mail address:

- uyum@aksa.com.tr

Our Corporate Governance Policies are one of the cornerstones of our strategy and an integral part of our business culture.



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