



BANTBORU CODE OF CONDUCT

"Our business is based on our values
and principles."



Ethics refers to the values and principles that underlie the relationships established in the social sphere.

Ethical responsibility is the ability to recognize and act on ethical values according to standards in a particular field or context. While there is an obligation to obey the law, ethical responsibility is a choice.

As BANTBORU employees and managers, we all comply with our CoC (Code of Conduct) uncompromisingly and we expect our suppliers, consultants, agents, independent contractors with whom we have business relations, and everyone who conducts business on behalf of BANTBORU to adopt these principles.

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**BANT
BORU**

Dear colleagues and esteemed business partners,

The centennial of the foundation of the Republic of Turkey, and the 51th anniversary of BANTBORU's establishment, 2023 marks the beginning of a new era in which we expand our global footprint with production on 5 countries in 3 continents.

We continue to grow with our innovative and reliable solution partner identity of the leading manufacturers of our country and the world in the automotive and cooling industries, which are directly related to the daily lives of people, with a structure that takes different cultures under its roof in different geographies.

From engineering and technological marvels that define the present and future of mobility to refrigeration devices that preserve food and reduce food and energy waste, we are the lifeblood of products that add value to everyday lives around the world. As a reliable partner of the global pioneers of the automotive and consumer durables industries in the production of original equipment, we strive to develop our business; we sincerely strive for a fairer, more equal and better social life on a sustainable planet.

Our ingenuity in doing our job, the sense of reliability we give to our business partners, and our determination to contribute to sustainability for a better life in a better world make BANTBORU a respected and desired brand in Turkey and around the world. This is the common success of the BANTBORU Family, and our strict adherence to our (Code of Conduct) is the guarantee of the continuity of this success that makes us all proud.

As all members of the BANTBORU Family, we shape our behavior and way of working within the framework of our common core Values. We integrate the care we exhibit every day while doing our job with the universally recognized principles of equality, respect, trust, honesty and transparency.

Our CoC, which guide our way of doing business, unite us around a culture of integrity.

The foundation of our business is based on our Values and Principles. We always pay attention to our BANTBORU CoC document, in which we have fully included in our company culture by collectively writing our ethical principles that are subject to our procedures while doing our business. The BANTBORU CoC document is a binding guide for all our employees, suppliers and all our stakeholders on how we will do our business from now on as of the date of its publication.

As BANTBORU employees, we are all obliged to comply with these principles. We expect all our business partners to comply with the standards of these principles. It is our common commitment as an expression of our respect for our business, our stakeholders, humanity, each other and ourselves to internalize our CoC, which we have written down here, and to apply them uncompromisingly in our business conduct.

I would like you to know that I will always be your supporter in fulfilling this joint commitment and I thank you for the utmost care and sensitivity that I am sure each of you will show in this direction.


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Our Values, Purpose, Vision & Mission

As a reliable business partner manufacturing original equipment for global leaders of automotive and refrigeration industries, we work resolutely to improve our business while endeavoring wholeheartedly for a better social life, more fairness, and more equality on a sustainable planet.

All members of BANTBORU family, regardless of their position within the company organization, are leaders of the job they take responsibility for. We lead our work by living our Values in line with our Purpose.

Our Purpose comes to life with our three core values, unites us in a common culture, and inspires us towards our Vision and Mission.



Our Values

- Reliable in Words

Our work ethic is built on openness, honesty and reliability. We act in full openness and honesty in all our interactions with our stakeholders, the society and our ecosystems; empowering our relations with reliability. We integrate our word with our work.

- Reliable in Work

We work together as an improvement-focused team and build solution-focused partnerships to deliver the responsibilities our work, to turn our business plan into consistent results and solid quality, and for the minimization of the risks. We take responsibility for our every action.

- Reliable in Forethought

We act in forethoughtfulness for the society and our ecosystems we fully comply global standards, as well as with laws and regulations in all our geographies, we respect all sensitivities and traditions of all the communities with we interact, we embrace diversities with inclusion. We don't deviate from integrity for people, the environment, equality and justice.

Our Purpose

To continuously improve ourselves for; more added value in our business ecosystems, more production and employment, and a better social life on a more sustainable planet.

Our Vision

To be an industry-leading solution partner who leads the market by exceeding customer expectations and to inspire our stakeholders with our activities.

Our Mission

To make contribution to values brought to life by automotive and refrigeration industries as a reliable solution partner with the high standard, innovative products that we deliver and with our multicultural team that holds diversity in high esteem, while providing sustainable contribution for the society and our ecosystems.

The BANTBORU CoC

Being reliable in our Word, Work and Forethought are our common core values. We integrate our word with our behavior, we embrace our responsibilities in all our work; we do not deviate from integrity for people, the environment and justice.

We act honestly and openly in our interactions with all our stakeholders, society and ecosystems. We take care to do what is right for our company, our business ecosystems, our planet and society, and to comply with our ethical principles. The BANTBORU CoC (Code of Conduct) guide us in this regard; defining how we all should behave as corporate citizens representing our company and our responsibilities towards our Company, each other, our customers, suppliers, authorities and society in general.



Full Compliance With Laws, Legislation, Regulations and The CoC

As BANTBORU, we are an organization based in Turkey, but we are a company doing business and production in different countries around the world. Wherever we do business, we are subject to laws and regulations, as well as various regulations related to our business. We are obliged to fully comply with the laws, legislation, legal and corporate regulations related to our business, as well as with Full Compliance with Laws, Legislation, Regulations and the CoC.

As BANTBORU employees, we all fully comply with these rules, and we expect the same standards from all our independent suppliers in our value chain. Our principles are binding for us as well as for our business partner suppliers. We expect our suppliers, consultants, agents, independent contractors with whom we have a business relationship, and everyone who conducts business on behalf of BANTBORU to meet the requirements specified in the document BANTBORU Supply Chain Sustainability and Ethical Principles (*) prepared in line with our sustainable and ethical principles.

In cases where local practices or customs conflict with the Laws, Legislation, Regulations, the CoC and the law, we must always comply with the rules in line with our obligations and act in accordance with the law. BANTBORU Ethics Committee will assist you if you have any questions on these matters.

For Whom The CoC Are Binding

The CoC are binding for all employees at all levels, contingent and contractual, indefinite and definite term, part-time and temporary employees and officers working in all facilities and joint ventures of BANTBORU in Turkey and other countries.

We expect all our business partners (suppliers, consultants, agents, independent contractors with whom we have a business relationship, everyone who conducts business on behalf of BANTBORU) to act in accordance with the BANTBORU Supply Chain Sustainability and Ethical Principles prepared in line with the CoC and the procedures related to our business.

We are responsible to ourselves, to each other, to the laws, to all persons, institutions and organizations we come into contact with due to our business, to the society we are a part of and to the planet we live on. We act in line with the the CoC in our interaction with our customers, suppliers, society and the surrounding community, and in all our work for BANTBORU while doing our job in our offices or production facilities.

All employees at all levels, conditional and contractual, indefinite and definite-term, part-time and temporary employees and officials working in all facilities and joint ventures of BANTBORU in Turkey and other countries have the responsibility to act in accordance with BANTBORU Code of Ethics and related business procedures and to request information and explanations about them when necessary. Training activities are organized for our company employees about our ethical principles and related procedures. The most up-to-date version of our ethical principles and documents related to our procedures are regularly shared with our employees.

BANTBORU Ethical Principles and BANTBORU Supply Chain Sustainability and Ethical Principles documents are available as downloadable files on BANTBORU corporate website.

Consequences of The CoC Violations

Violation of the CoC, as well as of our company procedures, legal regulations in all geographies where we do business, and of all other legislations, contracts and regulations to which we are bound by our commitments may damage the business, sustainability and the reputation of our company and our customers and may have negative consequences for the environment and society. Legal or criminal consequences for BANTBORU and/or perpetrating persons and/or entities, in the case of violations of severe nature.

Persons who commit such violations may be subject to disciplinary penalties up to the termination of their employment contract and, if necessary, relevant legal sanctions may be applied. Violations of BANTBORU Supply Chain Sustainability and Ethical Principles by real and legal persons in our supply chain and non-compliance with the procedures related to our business may result in compensation for the resulting damage and termination of contracts, depending on the contractual responsibility of the real/legal person in violation.

To report a suspicion of an ethical violation or misconduct or to ask a question, you can use the Ethics Hotline Email (etik@bantboru.com), you can reach the Ethics Manager directly by phone (+90 530 150 1308 and +90 262 6774700 Dhl 737). Your enquiry will be treated confidentially.

Source documents for additional information:

- BANTBORU Business Ethics Procedure
- BANTBORU Supply Chain Sustainability and Ethical Principles
- BANTBORU Occupational Health, Safety and Environment Handbook
- BANTBORU Code of Conduct and Employee Handbook
- BANTBORU Information Security Manual
- Bantboru Discipline and Enforcement Regulation

We Own and Fulfil Our Responsibilities with Our Ethical Principles

We have an identity that is respected as a reliable solution partner of the leading brands of our country and the world in two competitive industries that directly touch daily lives and therefore product safety, quality and innovation are always at the forefront, and we have an expanding global footprint with 5 different locations in 3 different continents.

In addition to legal and industrial compliance, we operate in a complex business line that incorporates many standards in various fields, including sustainability and ethics. This brings many important responsibilities for BANTBORU and its employees, as well as our suppliers, consultants, and all other subcontractors with whom we create value.

Our responsibilities and ethical principles are inseparable. Our ethical principles determine our responsibilities, and our responsibilities determine our ethical principles. We embrace and fulfil our responsibilities with our ethical principles.



Our Responsibilities as BANTBORU

Our Responsibilities under Laws and Regulations

BANTBORU acts within the framework of national Laws, Regulations and other legal rules and internationally recognized legal rules applicable in all geographies where it operates and in all its activities.

We keep all our financial books and business records to the highest standards of compliance, transparency, accuracy, completeness, and integrity; we take the necessary measures to ensure accountability and reliability in our books and records.

We conduct all our financial records in accordance with the laws of the Republic of Turkey and all other countries with which we have business relations, and all our activities in accordance with the legitimate interests/gains and expectations determined by law.

We are committed to utmost sensitivity in preventing all types of crimes and illegal activities, including crimes against the state's security, crimes against the constitutional order and the functioning of this order, embezzlement, misappropriation, bribery, theft, fraud, counterfeiting, abuse of trust, fraudulent bankruptcy, bid rigging and interference with tenders, interference with the performance of an obligation, money laundering or smuggling arising from crime, financing terrorism, being affiliated or connected with terrorist organizations, false testimony, perjury, corruption, and extortion, in all areas in which we operate.

As a company with international activities, we take care to comply with regulations regarding legal economic sanctions and export controls. We do not establish commercial relations with persons on embargo and sanctions lists, and if it is necessary to establish direct or indirect contact, we always apply to the necessary authorities for law and compliance before contact is established.

Our Responsibilities to Our Customers;

We work with a proactive approach that focuses on quality and customer satisfaction and responds to the needs and demands of our customers in the shortest time and in the most accurate way. We adopt an approach to our customers within the framework of respect, justice, good service understanding and courtesy rules. We do not compromise our Information and Data Security responsibilities; we carefully protect the confidential information of our customers.

Our Responsibilities to Our Business Partners;

We take care to fulfil our obligations fully, accurately and on time to our business partners, namely our suppliers, consultants, agents, independent contractors with whom we have a business relationship, and to everyone who carries out business on behalf of BANTBORU. We carefully protect the confidential information of our business partners by working in accordance with supplier policies.

Our Responsibilities to Our Competitors:

BANTBORU is an organization that considers its employees as its 'Most Valuable Asset'. Since our establishment, we have adopted internationally recognized human rights rules, taken all internal measures to ensure compliance with these rules, and we are a company that shows sensitivity in the implementation of these measures, and we declare this on every platform. We always fulfil all our legal obligations towards all our employees. We comply with all laws and regulations regarding human rights related to our company and our activities.

BANTBORU values the general goal of increasing women's employment in the sector; however, it has taken and implemented all measures to prevent discrimination in recruitment and working environment, as well as complying with national and international employment policies, laws and priorities.

BANTBORU does not tolerate any adverse treatment or discriminatory behavior against anyone within the company and its suppliers because of race, ethnic or national origin, skin color, nationality, gender, religion or beliefs, disability, age, marital status, sexual orientation, gender identity/expression or other individual characteristics protected by law. We expect all our business partners to act in accordance with BANTBORU standards and principles in working conditions, human rights, and social responsibility.

BANTBORU does not tolerate favoritism, abrasive behavior, harassing behavior including physical, sexual, and psychological harassment. Anyone who engages in such behavior may be subject to disciplinary action, including dismissal, in accordance with the provisions of BANTBORU Disciplinary and Implementation Regulation.

We organize training and development activities on subjects that will ensure the business and personal development of our employees and prepare an environment that will help them plan their careers. We take care to ensure that all our employees can easily reach BANTBORU senior management when they want to be heard.

We ensure the implementation of a balanced and fair wage and benefit policy, taking care to improve the quality of life and standards of our employees to the extent of the possibilities of the organization.

We accept and adopt the freedom of our employees to make their voices heard, to organize and to unionize within their legal rights and to ensure internal work peace. There is a union within BANTBORU, and collective labor agreements are made at regular intervals.

As an institution, BANTBORU has always been against forced labor and has given importance to continuous improvement efforts to eliminate drudgery. The collective labor agreement we have made with our employees is the guarantee of this. Again, the overtime contracts we make with our employees every year as an institution are one of the important measures we take against forced labor.

As an institution, BANTBORU strongly opposes child labor, illegal employment, forced labor,

modern slavery, and human trafficking in any form. We take all legal measures in this direction, including our business partners and all stakeholders with whom we have business contact, and we show sensitivity in the implementation of these measures.

Our Responsibilities towards the Environment and Society

BANTBORU observes environmental and social balances in all its economic activities. We strive to ensure that our planet can sustainably host the life on it and that our world offers a fairer, more equitable and more inclusive future for all people, starting with our employees and stakeholders.

In line with our Corporate Environmental Policy, we integrate our sensitivity to environmental sustainability into all our business processes, with a particular focus on renewable energy use, energy efficiency, carbon footprint reduction and zero waste. We endeavor to disseminate sensitivity and engagement in issues such as gender equality, empowerment of women in the workplace and social life in our value chain.

BANTBORU invests in environmentally friendly technologies in different areas such as protecting the environment and correcting the negative effects of our activities on the environment, reducing greenhouse gas emissions, renewable energy use and energy efficiency, Zero Waste, and attaches importance to in-house incentives for the dissemination of these investments.

We carry out all our activities by considering biodiversity and ecosystem protection. We respect the sensitivities and traditions of all societies we interact with, and we expect all our stakeholders with whom we have business relations to approach society, the environment and humanity with the same sensitivity.

Our Occupational Health and Safety Responsibilities

BANTBORU offers its employees a healthy, safe, and productive working environment. We take all necessary measures to protect workplace safety and the health of our employees and encourage compliance with these measures.

We take and implement measures in accordance with nationally and internationally recognized standards on health and safety at work. We provide our employees with the personal safety equipment they need to use for their work and trainings on the use of this equipment.

We make our plans on emergency preparedness, occupational accident prevention and management of occupational accidents, disaster preparedness, and provide necessary trainings to all our employees.

To ensure that public and private security personnel working for workplace security do not violate human rights in their practices, we show all care within the means, including training activities when necessary.

We ensure that all our suppliers comply with the rules and practices applicable in our company regarding Occupational Health and Safety.

Our Information and Data Security Responsibilities

Confidential and proprietary information and data includes commercial plans, production, product development and technology, information on research and development and patent studies, marketing and pricing information, customer information, information and data on personnel rights, information, and data within the framework of 'confidentiality agreements' concluded with third parties, as well as personal data and information.

We comply with the confidentiality rules of our employees, customers, all persons, institutions and organizations with whom we do business and/or cooperate; we do not share their information and personal data with third parties without permission and/or legal obligation. We comply with all relevant laws and regulations governing data privacy wherever we do business.

We keep all kinds of information, especially the information contained in the personal files of our employees, whether private or not, and we do not interfere with the private lives of employees. We fulfil the requirements of KVKK and other legislation and respect the privacy of our employees.

Source documents for additional information:

- BANTBORU Business Ethics Procedure
- BANTBORU Supply Chain Sustainability and Ethical Principles
- BANTBORU Occupational Health, Safety and Environment Handbook
- BANTBORU Code of Conduct and Employee Handbook
- BANTBORU Information Security Manual

Our Responsibilities as BANTBORU Employees

As BANTBORU employees, we are BANTBORU's most valuable asset and the main power behind all its achievements. We build this success together, keep it alive together and share it together.

Although our mindsets, ideas, and the cultural environments we come from may differ, we are united by our common core values. The different perspectives brought by our differences enrich us even more; we embrace our differences with our inclusiveness.

With our professional competences and BANTBORU's fair and impartial recruitment policies, we fulfil our duties in a working environment based on trust, openness and respect, free from harassment and discrimination.

In this environment, our responsibility is to learn our ethical principles and related procedures, to do our job diligently by complying with them, especially our occupational safety and health rules, information security rules and all legislation regulating our work, to take advantage of the training opportunities offered by BANTBORU to improve our professional competence and to work together in cooperation as a team that respects and trusts each other.

As BANTBORU employees, we are all aware of our obligation to act within the framework of

applicable laws, legal and all corporate regulations related to our business, national and internationally recognized legal rules, and the BANTBORU CoC in all BANTBORU activities, and in all geographies where BANTBORU operates.

As BANTBORU employees, the definitions and rules on how we should work, how we should act at work, and how we should use company assets are determined by the procedures related to our business, primarily by the BANTBORU CoC, BANTBORU Business Ethics Procedure, BANTBORU Business Conduct Principles and Employee Handbook, BANTBORU Occupational Health, Safety and Environment Handbook, BANTBORU Information Security Handbook. Compliance with ethical principles and all procedures and fulfilment of their requirements is the common responsibility of all of us.

We are the BANTBORU family. We embrace our responsibilities in every business, we integrate our words with our behavior; we do not deviate from integrity for the humanity, the environment, equality and justice.

Our Responsibilities under Laws and Regulations

As all employees of BANTBORU, we show due diligence in our daily work to ensure that BANTBORU complies with its obligation to act within the framework of national Laws, Regulations and other legal rules and internationally recognized legal rules applicable in all geographies where BANTBORU operates and in all its activities.

We take care to be careful when preparing any document and/or performing any transaction related to our business. Except for honest mistakes that may always occur, we refrain from intentional misrepresentation, irregularity, falsification and similar illegal behaviors. We avoid crimes against the security of the state, crimes against the constitutional order and the functioning of this order, embezzlement, extortion, bribery, theft, fraud, forgery and counterfeiting, abuse of trust, smuggling, being associated or connected with terrorist organizations, false witness, perjury, conflicts of interest, corruption, illegal employment, maltreatment and similar crimes and negative behaviors.

We inform BANTBORU management and BANTBORU Ethics Committee in a timely, complete and transparent manner about all situations that may be contrary to the law.

Our Responsibilities for Occupational Health and Safety

As all employees of BANTBORU, we support BANTBORU in its endeavor to provide a safe and healthy workplace for our business partners, as well as for everyone in and around our facilities; as a matter of our responsibility, we meticulously comply with all safety and health rules and practices related to our work.

We fulfil our responsibilities, including the use of appropriate personal protective equipment, operating machinery only according to instructions and taking appropriate action when a safety risk arises.

We honestly report situations that may adversely affect our judgement and/or physical functions during work and undergo necessary health checks in such cases. Except for social

events where alcohol consumption is permitted, we do not consume alcohol anywhere in BANTBORU facilities or during business hours. We do not use or tolerate the use of recreational substances or illegal drugs on BANTBORU premises or during business hours.

Our Behavioral Responsibilities in Business Life

As all employees of BANTBORU, we treat all BANTBORU employees, job applicants, business partners and everyone we come into contact within the course of our work with respect, regardless of their ethnic or national origin, religion, language, gender, race, physical disability, age, marital status, gender identity and sexual orientation and/or expression, marital status, seniority or any other personal characteristics protected by applicable laws.

We establish civilized and constructive relationships with each other and everyone we come into contact with due to our work in a professional and respectful manner on the basis of trust, openness, sincerity, goodwill, empathy; we show the care we show to our work to our communication with each other, our behavior, speech, dress and sensitivities of each other.

We always act honestly and tell the truth.

BANTBORU complies with all applicable anti-harassment laws in all geographies of operation. And we, as BANTBORU employees avoid and do not tolerate,

- › Verbal or physical violence, bullying, physical - sexual - psychological harassment, intimidation, threats,
- › Any action that may cause an individual to feel threatened or insecure,
- › Any offensive or disrespectful behavior of any person, whether BANTBORU employee or not, in the workplace,
- › Behavior that may cause people to feel uncomfortable and/or unwelcome at work,
- › Discrimination,
- › Intimidating, aggressive, disturbing the peace in the working environment and unwanted verbal, visual, physical or any other behavior,
- › Harassing or disrespectful behavior.

Under no circumstances do we engage in hurtful verbal or physical behavior towards each other.

We do not expect, nor do we show favoritism.

We know that harassing behavior is determined by how the behavior affects the addressee, and not by the thoughts of the perpetrator, regardless of his/her intentions.

We avoid threats, name-calling or raising our voice, rude behavior.

Apart from the responsibilities defined herein, our colleagues who serve as executive team leaders within BANTBORU share the responsibility for:

- › Ensuring the creation and maintenance of a corporate culture and working environment that supports our BANTBORU CoC,
- › Displaying exemplary behaviors in terms of encouraging the implementation of our BANTBORU CoC,

- › Reporting violations related to our BANTBORU CoC, encouraging employees to apply easily, to consult the BANTBORU Ethics Committee and to act in a way that protects the applicants from retaliation,
- › Ensuring that all business processes and behavioral patterns in their areas of responsibility are carried out and developed in a way that poses the least risk.

Sample Questions and Answers:

Question: My manager scolds me and my teammates when something negative happens at work. Can this be harassment?

Answer: The answer to this question may vary depending on the situation. We may not always agree with each other or hold each other accountable for our work in a respectful manner. However, if this attitude makes you feel a negative working environment and contradicts our rule of treating each other with respect and avoiding rude behavior, please communicate your concern to the BANTBORU Ethics Committee.



Question: I see a safety hazard on the production line / workstation, should I report it to the BANTBORU Ethics Committee?

Answer: Safety in our workplace is a shared responsibility of all of us and any situation that poses a hazard must be addressed immediately. The first place to report a potential safety hazard is to your supervisor and/or OHS professionals so that the situation can be addressed immediately. However, if you feel that you have not received a response and/or no action has been taken despite you reporting the situation, raise your concern with the BANTBORU Ethics Committee.

Source documents for additional information:

- BANTBORU Business Ethics Procedure
- BANTBORU Occupational Health, Safety and Environment Handbook
- BANTBORU Code of Conduct and Employee Handbook
- BANTBORU Information Security Manual

Keeping Accounting and Financial Records in Full Compliance and Transparency with Applicable Legal Regulations and All Legislation

At BANTBORU, we strictly comply with all provisions of all regulatory laws related to accounting and financial reporting and the national and international accounting and finance legislation to which we are subject, with our principles of transparency and accuracy. We share our financial statements with the official authorities and independent audit institutions required by our business, on time and in accordance with the relevant legislation.

In the course of our work, we all create different records, such as expense reports, contracts and quotations, timetables, different e-mail contents. It is very important that these records accurately reflect the current situation, that no information is destroyed and/or stored in any way, and that misrepresentations are avoided. Even the smallest misrepresentation carries the risk of causing undesirable consequences that may damage the business of our company, our customers and suppliers, undermine BANTBORU's reputation and have legal consequences.

Keeping complete and accurate business and financial records and all other records related to our business is a shared responsibility of all of us, not just accounting and finance employees. These records include financial accounting and Human Resources records, as well as other records such as quality reports, timesheets, expense reports, progress payment forms and CVs. Our records must also meet the requirements of our SAP system.

We keep all our records in accordance with the relevant laws and regulations, the BANTBORU CoC, BANTBORU Business Ethics Procedure, and other related business procedures.

Our Responsibilities in Relations with Official Authorities, Public Officials and Other Institutions

In addition to being a company that carries out production, co-production and distribution activities in different countries as well as Turkey, and an exporter that trades to different countries, the products produced by our business partners are subject to general sectoral regulations and different regulations in different countries of the world. We take care to ensure that all our products comply with the specifications requested by our customers and the relevant legal and sectoral regulations, and we monitor this with our relevant quality and other processes.

Provision of Timely and Accurate Information

We establish and maintain professional relationships with all official institutions, national and international organizations, our customers, the media and all other business partners with whom we do business in accordance with the laws and all relevant regulations within the framework of mutual respect and honesty.

We transmit the information required by our activities and collaborations to official institutions, customers, business partners, media and all other institutions in a timely manner, in the manner requested by us, in a complete and accurate manner, as stipulated by the relevant laws and regulations. We carry out information transmission in line with our Responsible Communication principles, and we obtain the internal approvals required by our procedures and processes before sharing any information with any party outside the company. If any information requested from us is of a confidential nature or if we have such a concern, we consult BANTBORU Management and BANTBORU Ethics Committee before information transmission.

We share information requests from official institutions, our customers, business partners, media and all other institutions with the relevant departments within the company and, when necessary, with BANTBORU Management and BANTBORU Ethics Committee and follow up the necessary processes.

Opposition to Bribery, Corruption, Fraud, Counterfeiting, Money Laundering, Assets Derived from Crime, Affiliations or Connections with Terrorist Organizations, and Terrorist Financing

BANTBORU does not tolerate any offences such as bribery, corruption, fraud, forgery and counterfeiting, money laundering and anti-financing of terrorism, which may be committed knowingly or unknowingly by its suppliers or third-party business partners, employees of these companies, as well as all employees within its own structure. We show sensitivity to prevent such behavior in all areas in which we operate. We uncompromisingly comply with the laws on these matters and the relevant rules of the BANTBORU CoC and related procedures.

Anti-bribery and Avoiding Behaviors That May Be Perceived as Bribery

In all geographies where we do business, we are determined to carry out all our activities in accordance with our ethical principles and in a way to ensure the highest ethical standards. We adopt all the principles of the UN Global Compact, of which we are a participant, we act in accordance with these principles, and we expect everyone we come into contact with as part of our activities to act in this direction.

Corruption, bribery and any form of benefit, transaction facilitating payments and inappropriate gifts in relations with official and civil authorities and organizations and in other business activities are behaviors that are illegal and subject to criminal sanctions in many countries, as well as violating the UN Global Compact's principle of "Businesses should fight corruption in all its forms, including bribery and extortion". At BANTBORU, we do not engage in, nor do we tolerate these behaviors.

We do not offer, promise or even imply any improper financial payment, cash, loan or commission or any behavior that will provide an improper benefit to a public official or any official or civil authority holder related to our business in order to provide a business or any other kind of advantage, even if local legislation and customs are flexible to such behaviors. When such a request or implication is received from any person regarding our business, we immediately forward the matter to the BANTBORU Ethics Committee and act as required by the law and our ethical principles.

We do not provide any improper benefit of material or moral value to a public official. Public officials cannot be employed by BANTBORU unless they finalize their employment in accordance with all relevant legislation. When it comes to the employment of persons who have previously served as public officials and whose relationship with the public has ended, we strictly comply with the rules and limitations stipulated by all relevant legislation.

In addition, we avoid behaviors that may create the impression and suspicion of such behavior. We take care to ensure that gifts given on special occasions in line with local traditions, travel and hospitality related to business or under the guise of business, sponsorships of other organizations' organizations, financial and in-kind aids and, without limitation, behaviors that are of a benefit-generating nature, do not exceed their intended purpose. We make sure that the frequency, financial compensation, and reasonableness of such behaviors are at a level that prevents them from being perceived as bribery.

We do not expect, nor do we show favoritism. We do not offer or accept goodwill gestures such

as travel, meals, hospitality, and symbolic gifts if they are not on favorable terms, if they could improperly influence the business relationship, including for gain, and if they would violate our ethical principles.

We do not tolerate our business partners and/or any third party acting on behalf of BANTBORU to bribe or engage in behaviors that may be perceived as bribery. Such behavior, regardless of whether it is within the knowledge of our company or not, may adversely affect our business, may have criminal consequences, and violate our ethical principles and may lead to contract termination.

In case of any suspicion of bribery, corruption and situations that may be perceived as bribery, we consult BANTBORU Management and BANTBORU Ethics Committee. The Ethics Committee shall seek the opinion of legal counsel when necessary.

Sample Questions and Answers:

Question: I work in the R&D department. From time to time, I have some work-related expenses such as stationery, etc. These materials are normally not available in the company. When my expenses amount to a certain amount, I get a taxi receipt from an acquaintance who works as a taxi driver. Can I do this?

Answer: You should not do this. Even if you are acting in good faith, recording an expense that we pay out of your pocket as if you have made another expense that you have not made is both against our BANTBORU Ethical Principles, legally irregular and open to abuse. You can talk to your manager about the expenses you have to make, and if these materials are absolutely necessary for the business, you can initiate purchasing processes in accordance with our company procedures.

Question: A municipality employee told me that the situation with a license for our company was difficult, but that we could use the advice of a company owned by a relative for a solution. I suspect corruption here, what should I do?

Answer: Please convey your doubts to BANTBORU Management, BANTBORU Ethics Committee and our Legal Counsellor as soon as possible. This kind of consultancy work should not be undertaken without detailed research on this issue and the compliance of the situation with the laws and ethical principles.

Question: Can I host public officials who will come to the company for inspection in a luxury restaurant for lunch?

Answer: As part of corporate representation, we always host our guests in appropriate conditions, but we should avoid extravagant behavior that could be perceived as bribery. It would be appropriate to host the auditors in our company cafeteria.



Source documents for additional information:

- BANTBORU Supply Chain Sustainability and Ethical Principles

Our Responsibilities in Relations with Our Customers and Business Partners

We ensure that all our products comply with the specifications required by our customers and the relevant legal and sectoral regulations, and we monitor this through our quality and other processes.

We meticulously analyze the needs and expectations of our customers and offer highly beneficial solutions and products that are in line with the requirements, address the needs and contribute directly to their strategic goals. We continuously improve ourselves for more added value to all our stakeholder ecosystems, more production and employment in the geographies where we operate, and better social life on a more sustainable planet.

We establish relationships with our customers, business partners and all other stakeholders based on respect, law and honesty in compliance with the law and our ethical principles. We fulfil the requirements of our business contracts, commitments, and orders in compliance with laws, contracts and regulations, quality control principles and ethical principles. We show the behavior that we want to be displayed towards us to everyone we come into contact with due to our business.

We do not engage in unfair, misleading, and deceptive behavior towards our customers, business partners and all other stakeholders; we are always honest and straightforward in the promotion and presentation of our company, products and solutions.

In all our procurement processes, we act fairly and in accordance with all relevant laws and regulations related to our business. We pay attention to the use of legal and clean raw materials; we do not use prohibited raw materials in our products.

We comply with applicable laws and regulations on export controls and economic sanctions. We continuously develop, implement, and maintain appropriate methods and processes to minimize the risk of counterfeit and counterfeit parts and materials entering our products. We implement processes to detect counterfeit and counterfeit parts and materials, to detect status and quarantine where necessary, and to notify the relevant OEM (Original Equipment Manufacturer) customer and law enforcement as appropriate.

Due Diligence

In our collaborations with our customers, business partners and all other institutions and organizations, we strictly comply with the Due Diligence requirements required by law, business processes and our ethical principles. We transmit information and documents such as financial statements and legal documents required by Due Diligence processes requested from BANTBORU in a timely and complete manner unless there are legal obstacles and confidential information obstacles; we inform the relevant party of the information and documents that we cannot transmit due to legal obstacles and confidential information obstacles.

Similarly, we meticulously follow the Due Diligence processes requested by BANTBORU, information and information flows such as financial statements and legal documents; we share the information of information and documents that cannot be communicated to us due to legal obstacles and confidential information obstacles with the relevant units within the company, BANTBORU Ethics Committee and BANTBORU Management.

We inform the parties about the results of the Due Diligence process.

Responsible Communication

BANTBORU respects all legal rights of all its employees regarding freedom of expression and communication and their freedom within the legal framework.

As BANTBORU employees, while using this freedom, we act with the awareness of our responsibility to ensure that what we write and say about our business complies with the laws, that everything we write and say about our business is honest and accurate to the best of our knowledge, that it is compatible with our ethical principles, and that it respects personal and human rights.

We communicate with our colleagues and the people and institutions we come into contact with regarding our work, with the awareness that our internal or external correspondence may be disclosed to the general public, knowingly or unknowingly, with good or bad intentions. In line with our principle of transparency, we have designated official spokespersons who are authorized and tasked to make statements about BANTBORU in order to inform the media, the public, regulatory authorities and other stakeholders accurately and completely. Our employees who do not have such authorization and duty should refrain from making public statements to members of the media, social media content producers, industry and business world experts and analysts, academicians and other persons on issues related to our company and our business, even if they are requested to do so. Such information requests should be directed to the units, individuals and corporate spokespersons in charge of corporate communication within BANTBORU.

We forward information requests from official authorities and public officials and all business-related communications to BANTBORU Management in a timely and accurate manner, and information flow is provided to the relevant units according to the content in line with the management guidance.

In social media and in all other media and communication environments, and in business meetings and social gatherings, even when access is limited with two people such as family, friend groups, even if access is limited, defamation and defamation of BANTBORU, its competitors and suppliers, confidential information of BANTBORU, its suppliers and competitors. We refrain from producing and sharing written, verbal, visual and other contents that disclose patents, copyrights and non-public information under legal protection, and from sharing and disseminating such contents and contents that may constitute a crime with others. In such a case, we inform the BANTBORU Ethics Committee and BANTBORU Management without expressing comments, ideas and opinions in any media and without contacting the content producer institution or person.

We refrain from producing and sharing written, verbal, visual or other content that denigrates and slanders BANTBORU, its suppliers, and competitors, or that discloses BANTBORU's, its suppliers' and competitors' confidential information, patents, copyrights, and non-public information under legal protection in social media, in other communication channels and environments, in business meetings and social gatherings, even in situations where access is limited such as between two people or in family or friend groups. We also refrain from sharing and disseminating such content that may come to us from outside and may constitute a crime with others. In such a situation, without expressing any comments, opinions, or views on any platform and without contacting the content creator, we inform the BANTBORU Ethics Committee and BANTBORU Management.

Any employee of BANTBORU who thinks that BANTBORU should inform the public on any issue may raise this issue before the units and persons in charge of BANTBORU corporate communication, BANTBORU Ethics Committee and BANTBORU Management in line with its content.

Information on the use of e-mail, social media, internet, fax, is specified in our BANTBORU Information Security Handbook.

Our Responsibilities for Information and Data Security & Privacy

As all employees of BANTBORU, we are aware of our responsibility to protect all non-public confidential information of BANTBORU as well as confidential information and data entrusted to us by our customers, suppliers and other business partners.

We learn about the nature of the information we are aware of, use or manage in the course of our business and the consequences of its loss or disclosure.

We do not discuss confidential information about our business, our company and our stakeholders and related issues outside and/or within the company in public places such as dining halls, lifts, service vehicles and similar public places, and we do not cause discussions and negative comments.

We do not share confidential information with persons, institutions and organizations without the permission, knowledge, and assignment of our company.

Confidential information includes all information that BANTBORU has not disclosed to the public or made available to the public within the framework of the relevant legal rights and all information that our customers, business partners, suppliers and all other external stakeholders share with us regarding our business, which has not been disclosed to the public or made available to the public within the framework of legal rights.

Privacy includes personal information, as well as information relating to commercial plans, production, product development and technology, research and development and patent work, marketing and pricing information, customer information, information on personnel rights and information under "confidentiality agreements" with third parties.

We do not share the confidential information of our company, our employees, our customers, the institutions and organizations we do business with persons and institutions unless there is a legal obligation to do so, and we comply with the confidentiality rules of our company and

the institutions and organizations we do business with, unless the law prohibits it.

We use non-public information only for business purposes and do not share it with anyone inside or outside the company, including friends and family members, except for authorized persons. We do not talk about non-public information in public places, and we carefully preserve all objects containing this information, including written documents, personal notes, mobile devices, computers, electronic storage devices. We password-protect all electronic devices we use to access BANTBORU information and immediately report any loss of equipment or information to our managers.

No electronic copy of any document belonging to the employer shall be recorded, printed or written or otherwise taken on paper, CD, DVD and other recording devices without the permission of the employer's authorities and outside the natural course of business. These documents cannot be transmitted to others electronically or by other methods and cannot be subjected to deletion, addition, tampering, assembly, etc. Unless there is a contrary legal situation, our obligation to comply with confidentiality rules continues even after we leave our job.

For information that we are not sure of the level of risk and/or the appropriate level of protection, the opinion of our relevant managers and/or the Information Security Management representative is obtained. When necessary, we obtain information from the BANTBORU Ethics Committee.

BANTBORU Ethics Committee shall seek the information of our Legal Counsellor when necessary. If we suspect any unauthorised and/or misuse of information and/or intellectual property of BANTBORU, our customers or any of our business partners by anyone, we immediately report the situation to BANTBORU Ethics Committee and BANTBORU Management.

Opposition to Insider Trading

Due to our business, in some cases, it is possible for us to access confidential information about BANTBORU, our customers, business partners or competitors, such as product, investment, project plans, which may provide legal and unfair advantage when used for investment purposes and which have not yet been disclosed to the public. This information is within the scope of confidential information.

It is our responsibility to keep such information confidential within our ethical principles and the rules we must comply with. In addition, the use of such information by an employee to buy or sell securities such as stocks and bonds in order to benefit himself/herself or any person, group, institution or organization (Insider Trading / Insider Trading) is illegal and may be subject to serious criminal sanctions.

We do not use confidential information we obtain about BANTBORU, our customers, business partners or competitors for investment purposes until such information is publicly disclosed. We do not share this information with persons outside BANTBORU, including BANTBORU employees who are not authorized to obtain information and our family and relatives. It is forbidden to use this information for profit and to share it with others.

We do not tolerate behaviors of our business partners, company shareholders and employees that are contrary to our principle against Insider Trading.

Sample Questions and Answers:

Question: One of our listed clients shared their 5-year investment plans as confidential information at the meeting. However, my cousin is a stock trader and the other day he told me that there was a rumor about this and asked me "is there any truth to it?". Since there is a rumor about this issue, can I tell my cousin "Yes, it is true"?

Answer: No. Even if there is a rumor about this issue, unless our customer company makes an official statement on this issue, this is confidential information and disclosing it to the outside world is considered as Insider Trading. Providing any information in this regard would violate our CoC and may lead to legal sanctions for you, BANTBORU and our customer. Do not give any information on this subject to anyone who is not authorized for business purposes until our customer makes the relevant official statement.

Question: As a department, we are preparing a long and detailed report for a customer. I think the work was rushed and wrong data was put into the report. What should I do?

Answer: Such an act, if done deliberately, is against our principles of honesty and fair behavior. Warn your colleagues and ask them to act in accordance with our ethical principles. If you do not get a result, report the matter to BANTBORU Ethics Committee and BANTBORU Management before the report is sent to the customer.

Question: An employee of one of our project partners made what I believe to be a deliberate misstatement about products in a joint meeting with a customer with whom we do business. What should I do?

Answer: If possible, correct the error during the meeting. If not possible, discuss the matter with the person after the meeting and transfer the situation to the relevant units within BANTBORU, and if there is a possible misunderstanding or information, ensure that it is corrected. If you suspect that the transfer of erroneous information has been made deliberately and will continue, refer the matter to the BANTBORU Ethics Committee.

Question: I saw a false news article about our company on the website of a newspaper. I have the name and e-mail address of the person who made the article. Can I send him/her an e-mail telling the truth?

Answer: In line with our principle of transparency, we have designated official corporate spokespersons who are authorized and tasked to make statements about BANTBORU in order to inform the media, the public, regulatory authorities and other stakeholders accurately and completely. If you do not have such authorization and are not in this position, you should refrain from making a public statement about BANTBORU to members of the media, social media content producers, industry and business experts and analysts, academics and other persons on matters related to our company and our business, even if it is for the purpose of correcting a false news report. Direct the relevant news to the units, individuals and spokespersons of BANTBORU in charge of corporate communication within BANTBORU.



Source documents for additional information:

Ek bilgi için kaynak dokümanlar:

- BANTBORU Business Ethics Procedure
- BANTBORU Code of Conduct and Employee Handbook
- BANTBORU Occupational Health, Safety and Environment Handbook
- BANTBORU Information Security Manual

Anti-Monopoly and Fair Competition

Competition is part of our corporate culture, yet we believe in and respect free and fair competition.

Our ability to compete independently of scale in our own field is fueled by the reputation of our brand, our creative power of success in R&D, production and business conduct, the sense of trust we have established with our customers and business partners, and the fact that we handle our social responsibilities with a universal perspective as well as our business.

We adopt ethical standards in our communication activities in which we share the unique story of our brand with our stakeholders and the society in general. We do not give misleading information about our company and products, we do not engage in defamatory discourse against our competitors, and we consider social sensitivities when creating our messages and visuals.

We believe that competition should take place on legal and ethical grounds and within the framework of competition law. Under no circumstances do we support attempts to cripple, restrict or limit competition. In competition shaped by the specific conditions of our own business line, we are committed to complying with the competition laws and anti-trust laws applicable in all geographies in which we operate.

We do not engage in actions that would violate these laws and that would be knowingly contrary to the reasonable, lawful and equitable interests of our customers or our supply chain, such as setting prices and discounts, setting terms of sale and/or purchase, limiting production, dividing markets, coordinating bidding or solicitation of bids, agreeing with competitors and/or other third parties to engage in customer or supplier boycotts or similar anti-competitive practices. We do not wish to be a party to offers and proposals that are contrary to fair competition.

As a requirement of competition, we collect information about our competitors in compliance with competition law rules and ethical standards; however, this information is publicly available and accessible to anyone who inquires. We respect the confidential information of our competitors just as we are sensitive to confidential information in our own company. We do not disclose the confidential information of our competitors, customers or business partners, nor do we use any confidential information of a competitor, customer or business partner that may be disclosed in any way to the detriment of that competitor, customer or business partner, or in a way that may injure competition.

We fully embrace fair trade and honest competition based on integrity, product quality, price and customer service in all operations over which we have management control.

We always seek legal advice and conduct an ethical review before collaborating with an organization, whether a competitor or not, in possible strategic alliances, joint tenders (consortium tenders) and/or joint production and subcontracting activities. In cases where we are unclear about our own competition responsibilities, we seek counsellor guidance.

We do not make job offers to employees of our competitors and customers for the purpose of crippling competition. The employment of a person who has previously worked for a competitor or customer of ours in our company may only be possible on his or her own application and only if there is no legal or contractual impediment to his or her employment. In such a case, we require the person to provide a legally valid declaration of suitability for employment and expect the person to inform his or her former employer. We never ask a person who is or was previously employed by a competitor, customer or business partner, to disclose confidential information, trade secrets or other information that they are legally obliged not to disclose.

Sample Questions and Answers:

Question: A prospective customer of ours is organising a tender next week. A friend of mine who works for the company that will be our competitor in the tender called me and told me that it would be unprofitable to bid below this price, so we should not go below this price. Should we take this into consideration when setting the price?

Answer: No. We never engage in such dialogues with competitors when setting prices. This is against both our ethical principles and legal competition issues. Make this clear to your friend as our company's stance. If this situation repeats, inform BANTBORU Management and BANTBORU Ethics Committee.

Question: One of our suppliers has increased the price of the product they sell to us. Can I learn the amount they paid from a friend who works in an unrelated sector and who works in a company that uses the same material, set a price together and negotiate with our supplier?

Answer: No. We do not engage in dialogues with other companies, even if they are not our competitors, in order to put pressure on our suppliers. If the supplier price causes problems in our cost calculations, we may need to investigate supply alternatives and review our cost calculations.

Question: An employee of one of our customers (or a competitor) sent his/her curriculum vitae (CV) asking us to evaluate him/her for an open position. Can we evaluate this person for this position?

Answer: Since it is her/his own application, we can consider her/his application for the position if there is no legal or contractual obstacle. However, during the evaluation process, she/he will be asked to provide a legally valid declaration of suitability for employment.



Avoiding Conflicts of Interest

In addition to not demanding or accepting any personal benefit in return for the work and activities we carry out due to our duties and jobs within BANTBORU, and not offering such a thing to anyone else, we take care to prevent possible conflicts between our personal interests and BANTBORU interests and our responsibilities towards BANTBORU.

We take care to protect the benefit of the company while doing our job, and we avoid any kind of behavior that may mean gaining benefits for ourselves or our relatives.

We are aware that situations such as direct management within our relatives, decision-making position regarding business relations with them or with an institution or organization in which they have a serious interest, may constitute a conflict of interest or cause such an impression. We communicate such situations, which may affect the fairness and transparency of our business relations and the working decisions we need to make due to our duties and position within the company, to our relevant supervisors and act in a way to prevent conflicts of interest.

We do not allow our personal economic, academic, social activities outside the company to prevent us from allocating the necessary time and concentration to fulfil our duties within BANTBORU and cause conflict of interest.

We do not accept paid or unpaid duties and positions in any institution or organization outside the company without the knowledge and permission of BANTBORU Management.

We do not misuse our titles, positions and authorities that we hold in our company and in business organizations that we come into contact with as part of our work, or use them for the purpose of obtaining benefits for ourselves or our relatives.

We do not adopt and approve the use of our business partners' business relations with BANTBORU for the purpose of providing benefits for the company shareholders, employees and their relatives.

Sample Questions and Answers:

Question: I am a purchasing department manager. For a product we need to purchase, there is a company that is competent in its field, offers the best quality product and offers the most favorable price offer, and this company meets our standard purchasing standards. However, my spouse is one of the partners and general manager of this company. What should I do?

Answer: Although this company seems to be selected as a result of fair and impartial evaluations of the purchasing process, there may be an impression of personal interest about you as one of the people who will make a purchasing decision. You may inform the BANTBORU Management within the knowledge of the BANTBORU Ethics Committee and request that the evaluation be made by the management instead of you.



Utilization of Company Assets and Resources

BANTBORU's most valuable asset is BANTBORU employees. The protection of our employees, like all assets of our company, is the common responsibility of all of us.

Our company assets include company-owned materials, equipment, machinery, vehicles and transport vehicles, electronic devices, as well as confidential and proprietary commercial information and intellectual property, software and technologies, inventories, R&D information, financial resources and working hours during working days.

Sample Questions and Answers:

Question: My company-issued laptop was stolen while I was out of the office. What should I do?

Answer: In addition to legal proceedings regarding the theft, immediately notify your supervisor, BANTBORU Management and BANTBORU IT and clearly identify company records, work-related information and confidential information contained on the laptop.



Source documents for additional information:

- BANTBORU Supply Chain Sustainability and Ethical Principles
- BANTBORU Code of Conduct and Employee Handbook
- BANTBORU Information Security Manual

Our Responsibilities towards the Environment and Society

BANTBORU'nun tüm çalışanları olarak, günlük işlerimizde Kurumsal Çevre Politikamıza uygun As all employees of BANTBORU, we act in accordance with our Corporate Environmental Policy in our daily work and contribute to BANTBORU's ability to observe environmental and social balances in all its economic activities within our own business responsibilities.

We support BANTBORU's environment and community-oriented initiatives.

Political Activities

BANTBORU, apart from endeavoring to ensure that the matters requiring public interest in our sector, activities, production facilities, employees and other matters concerning our business are known and understood by the relevant public officials, acts impartially in the political field and does not interfere with the interest of individuals in political processes as long as it remains within the legal framework.

Individuals' participation in political life is subject to different laws in different countries and individuals should act in accordance with the laws and regulations of the respective countries.

We, BANTBORU employees, comply with all provisions of the relevant laws in political processes in which we may individually take part. We do not involve politics in our business life. We do not allow our political views to influence our business decisions in any way, we do not make political propaganda at work.

We do not request financial support from BANTBORU for political activities in which we may individually take part, and we recognize that such support is out of the question. We do not use BANTBORU reputation and BANTBORU assets and name, including our time at work, for such political activities and to further our interests.

We refrain from behaviors that constitute offences under the law, such as hate crimes, defamation, discrimination and separatist activities.

Implementation and Audit of BANTBORU Business Ethics Principles

The responsibility for the implementation of the BANTBORU of Business Ethics rests with all BANTBORU employees, while the responsibility for monitoring its implementation lies with the BANTBORU Ethics Manager and the Ethics Board. The BANTBORU Ethics Board ensures the complete implementation of the BANTBORU Code of Business Ethics and related procedures.

BANTBORU Ethics Board conducts investigations and inquiries in a transparent and fair manner in accordance with the BANTBORU Code of Business Ethics and relevant procedures; implements and monitors the recommended corrective actions in cases where a violation is believed to have occurred, and, if necessary, refers the investigation file to the Disciplinary Board for the application of disciplinary sanctions.

Violations of the BANTBORU of Business Ethics outside of Turkey will be addressed in coordination with the relevant country's senior management and the BANTBORU Ethics Board, and processes will be conducted in coordination with the relevant country's senior management and the BANTBORU Ethics Manager.



Formation of BANTBORU Ethics Committee

BANTBORU Ethics Committee members are appointed by BANTBORU CEO. The structure and functioning of the Ethics Committee is described in BANTBORU Business Ethics Procedure. The Board reports directly to the CEO and may report to the Board of Directors on its activities when necessary.

If the alleged violation of BANTBORU BUSINESS ETHICS PRINCIPLES is related to a manager or department appointed as a board member, this manager or a member of the department cannot serve as a board member in the process in question and cannot influence decision-making. In order to ensure that the examination is concluded in a healthy and objective manner, the opinions of the relevant department managers are taken.

How to Raise Concerns about Ethical Violations

Ethical Violation includes a situation contrary to Laws, Legislation, Regulations, Business Ethics Principles that we are obliged to comply with. It is our collective responsibility to speak up as soon as possible when we encounter or are concerned about such a violation or misconduct. Waiting may cause the situation to worsen.

To report a suspicion of an ethical violation or misconduct or to ask a question, you can use the Ethics Hotline Electronic Mail (etik@bantboru.com). You can reach the Ethics Manager directly by phone (+90 530 150 1308 and +90 262 6774700 Dhl 737). Your enquiry will be treated confidentially.

Privacy

Providing information about your own identity when reporting ethical violations or misconduct will benefit you in terms of providing feedback and investigating the behavior. Your applications will be evaluated on the principle of confidential and anonymous employee and business partner reporting.

Your identity will be kept confidential while your question or concern is being processed, unless there is a legal requirement to do so.

You can also report your suspicion of an ethical violation or misconduct anonymously.

Internal Ethics Application Mailboxes, which are located in all our locations and regularly checked, are located outside the field of view of security cameras.

Prohibition of Retaliation

BANTBORU does not tolerate retaliatory misconduct such as dismissal, threats, harassment or other retaliatory misconduct by any person or persons within its own organization or within its business partners for reporting ethical violations and misconduct concerns, asking questions, reporting problems or assisting in a misconduct investigation in good faith.

It is our collective responsibility to report our concerns about ethical violations and misconduct, even if we think it is a minor issue or we are unsure whether it constitutes a problem. Any complaint made in good faith will be protected against retaliatory misconduct, even if it turns out that the complainant was mistaken.

Anyone who engages in retaliatory misconduct may be subject to appropriate disciplinary action, up to and including dismissal.

Ethical Violation Investigations

BANTBORU Ethics Committee reviews all ethical violation and misconduct allegation reports and ensures that any behavior that may violate the Laws, Legislation, Regulations, BANTBORU Business Ethics Principles is investigated by the relevant function depending on the content of the relevant report. Employees under investigation will have the opportunity to rest before a final decision is made.

BANTBORU Ethics Committee guarantees the confidentiality of questions and notifications, conducts an impartial and fair investigation and shares the results with the relevant persons, ensures the occupational safety of the employees who report, investigates complaints and notifications in a timely, fair and consistent manner and takes necessary actions regarding the results.

When a report is generated, you may be contacted by an investigator so that further information can be gathered about your report. Where possible, you will be kept up to date on the status of the investigation. On the other hand, it is also possible that you will not be informed about the outcome of an investigation for reasons of confidentiality.

Verdicts & Decisions

The BANTBORU Ethics Committee conducts investigations and inquiries on violations of BANTBORU Business Ethics Principles and disciplinary matters; it makes the decision on matters that require warning and admonition penalties; however, local site management may be authorized for certain categories of investigations.

The Disciplinary Board is authorized to impose all kinds of disciplinary penalties except for warning and admonition penalties. In the cases reported to the Disciplinary Board, the individuals who are determined to have violated the BANTBORU Code of Business Ethics and who have new information that has not been taken into consideration by the BANTBORU Ethics Board have the right to request a review of the violation and disciplinary decisions.

More detailed information on the investigation and decision-making process regarding violations of the BANTBORU Business Ethics Principles is available in the BANTBORU Business Ethics Procedure.

Disciplinary Measures

Efforts are made to take disciplinary measures against each violation of BANTBORU Business Ethics Principles in accordance with the nature of the violation in question and the circumstances.

A progressive disciplinary system is applied. Warning letters are issued for less serious first-time violations of the Code. More serious violations may result in suspension without pay, withholding of benefits and bonuses, or dismissal.

In the event that an employee is found to have violated the BANTBORU Business Ethics Principles, a copy of the letter containing the final decision and the warning letter is added to the employee's personal file as part of their record. For violations that warrant more severe penalties than warnings and reprimands, the final decision, in accordance with the BANTBORU Discipline and Application Regulations, is communicated to the concerned individual by the Human Resources Department and added to the employee's file.

Reporting of Ethical Principles Violation Decisions and Investigations

BANTBORU Ethics Committee reports to BANTBORU CEO and Board of Directors all ongoing ethical principles' violation investigations and final violation decisions, together with the disciplinary measures taken, as described in BANTBORU Business Ethics Procedure.

BANTBORU Ethics Manager may use some violation cases anonymously for employee training purposes by removing identifying features and with the approval of BANTBORU senior management.

Signature and Approval

All new employees are expected to fill out a consent form stating that they have read the BANTBORU CoC and related procedures and agree to comply with its content, and all employees are expected to give this consent regularly. Failure to read the BANTBORU CoC and related procedures or to sign the consent form does not constitute a valid excuse in cases of violation.

Sample Questions and Answers:

Question: What is retaliation?

Answer: Within the scope of our CoC, Retaliation defines malicious behaviors that may be attempted against the person or persons who report a situation that is contrary to the law, the BANTBORU CoC, and all regulations and rules related to our business to BANTBORU Management and/or BANTBORU Ethics Committee due to their responsibility, or who reveal such a situation.

Retaliation can take many forms, including negative behavior such as exclusion, harassment, discrimination, threats, insults, harassment, reassignment, obstruction of career opportunities, increased supervision and control over the employee.

Anyone who engages in retaliatory misconduct may be subject to appropriate disciplinary action, up to and including dismissal.

If you are subjected to retaliatory misconduct or if you believe that a colleague has been subjected to such behavior, report the matter to BANTBORU Management and/or BANTBORU Ethics Committee.



Source documents for additional information:

- BANTBORU Business Ethics Procedure
- BANTBORU Supply Chain Sustainability and Ethical Principles
- BANTBORU Discipline and Compliance Regulation
- BANTBORU Code of Conduct and Employee Handbook

Issue	Revision Date	Revision No	Explanation
05.01.2023	-	Issue	Ethics and Disciplinary Board was defined.
-	25.01.2024	A	

Prepared By

Seda ECE HEKİMOĞLU
HSE, Sustainability & External
Communication Manager

Approval

Sinan GİDER
CEO / General Manager

Notes

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Notes

A series of horizontal dashed lines for writing notes.

Notes

Bantboru Code Of Conduct Handbook

Registration Number :

Name Surname :

Department :

Job :

I received the booklet containing the Bantboru Business Ethics Rules regarding my duty in exchange for a signature.

I submit and declare that I have read and accepted the basic rules regarding Information Security stated in this booklet, that the problems arising from my failure to comply with the rules will be my personal responsibility and therefore I will accept the measures to be taken.

Date : .../.../.....

Signature :

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**BANT
BORU**

Ingenuity
Reliability
Sustainability

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