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Egemet Ege Metal Dövme is an innovation and technology focused corporation that values continuous development, team spirit, social responsibility, collaboration, internal/external customer satisfaction, communication and sharing that has adopted a management system based on principles and transparency for its respect for people and environment. The company ultimately aims to achieve sustainability in these values.

Egemet Ege Metal Dövme is a signatory to the United Nations Global Compact, (UNGC) and acts in full compliance with the 10 fundamental principles of UNGC listed below. These principles also form the basis of our work ethics.

Egemet's Ethics Policy and Rules of Conduct defines the rules of business that the company expects its employees, suppliers and business partners to comply with. Egemet also expects its employees, suppliers and business partners to follow the same rules and maintain the same level of transparency in their relationship with their own staff as well as any other party that has been contracted with to provide products/services to Egemet.

1.PURPOSE

Egemet's Ethics Policy, assures compliance with legal obligations and rules of ethics at all times for its employees, managers and representatives in the conduct of business with suppliers, clients and other employees. Fraud, deceitfulness, false declaration and other wrongful acts are strictly banned.

Contract of Employment is supplementary to the Ethics Policy and Rules of Conduct, like Egemet Internal Regulations and other Egemet policies and procedures, and must be interpreted together. Our suppliers and business partners are also expected to comply with this hereby Ethics Policy and Rules of Conduct, in addition to all applicable national and international laws and regulations.

In cases where applicable laws and regulations provide stricter regulations than this hereby Ethics Policy and Rules of Conduct, the related laws and regulations shall prevail. Egemet expects its suppliers and business partners to initiate any policies, procedures and/or training that they deem necessary to assure compliance with this hereby Ethics Policy and Rules of Conduct.

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Our suppliers and business partners are obliged to comply and assure compliance of their employees with Labor Act no 4857, Law on Occupational Health and Safety no 6331 and related regulations in all business activities with Egemet.

Egemet shall appoint a representative to the Ethics Committee to monitor and manage this process. At Egemet, the Staff and Administrative Manager shall bear this responsibility as the role of company representative will require adequate knowledge and experience on company process and procedures.

Staff and Administration Manager shall prepare and deliver periodic activity reports to the company Management. Together with other Department Heads, Staff and Administration Manager will be responsible for the implementation/of monitoring of and making suggestions to the Company Management for any necessary revision to defined rules in line with any amendments in applicable legislation, best business practices and/or other company principles.

Staff and Administration Manager shall report all corrective action towards any solution regarding violation of legislation and/or rules of conduct by any employee, manager, representative or proxy. Staff and Administration Manager cannot assign any corrective action without prior approval of the Company Management.

When necessary, Egemet may audit suppliers and other business partners itself or through third parties to assure compliance with the above obligations and responsibilities, provided that the business partner in question is priorly informed. Egemet reserves the right to immediate termination of its business relationship with suppliers and business partners who fail to comply with applicable law, regulations and terms/conditions of this hereby Ethics Policy and Rules of Conduct.

2. GENERAL

All employees, managers, representatives and agents must at all times comply with Egemet Ethics Policy and Rules of Conduct. All communication shall be appropriate and in line with the rules of conduct and shall protect Company name and reputation. Weakness in the protection of data may cause harm to Egemet and its business.

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All employees, managers, proxies and representatives must protect confidential information regarding Egemet, its business partners and clients. Egemet employees, managers, proxies or representatives are not allowed to disclose any confidential/commercially critical information with the exception of legal obligation and/or being authorized to do so by Egemet management. Such confidential/critical information is not limited to data regarding contracts, business plans, projects, pricing or financial details but also includes information regarding employees, clients and representatives.

3. RECORDS

Accuracy and continuity of Egemet's business and financial records is of utmost importance. Records of quality reports, time tables, expenditure reports, requests for assistance, CVs etc. must also be duly kept. Egemet is obliged to comply with all laws and legislation regarding storing and maintaining of documents. Hence, all employees are expected;

- to register and categorize all transactions in the appropriate accounting period, account and department,
- never to distort real purpose/character of any transaction,
- never to falsify any document,
- never to assist/provide basis for third person's infringement of any law especially with the purpose of tax evasion or money laundering and,
- to always support forecasts and accruals with appropriate documentation.

4. NON-DISCRIMINATION

Egemet, its suppliers and business partners provide equal opportunity for all their employees. Official business language is Turkish. Egemet undertakes to offer a work environment free from any discrimination and harassment. Egemet and its suppliers and business partners shall not discriminate against any individual during recruitment based on their gender, color, religion, ethnic background, age, political tendency, disability, marital status, sexual preference, financial status and other sensitive/fragile factors including responsibilities toward one's family, nature of the job or requirements that are irrelevant to the individual's talent/skills.

Our suppliers and business partners are obliged to non- discrimination based on gender for payment of salary/ wages.

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All employees, suppliers or business partners must report any suspected violation of this principle immediately to Egemet Staff and Administration Manager and/or General Manager.

5. SEXUAL HARRASSMENT AND OTHER ABUSIVE BEHAVIOUR

Egemet supports the reputation of all its employees, business partners, managers, representatives and proxies (including gestures, verbal or physical contact). Egemet, its suppliers and business partners shall provide a work environment free from harassment, saber-rattling and violent, destructive or other abusive behavior that does not tolerate acts of disrespect including abuse, sexual harassment, discrimination, mobbing, bullying, etc.

6. DATA PROTECTION AND CONFIDENTIALITY

Egemet attaches importance to the protection of data. Egemet is responsible for protecting its own data and information that it has been entrusted with.

Egemet employees, clients and business partners are obliged to protect Egemet information that they have obtained through their commercial or legal interaction as their own, refrain from disclosing/making available such information to third parties including their partners and unauthorized employees who may not be subject to obligation of confidentiality.

Egemet has established its process and procedures within the framework of law number 6698 regarding Protection of Personal Data. Personal data is processed and protected in line with Egemet Processing and Protection of Personal Data Policy.

Suppliers and business partners may only use and share personal/ Egemet company data they have obtained through their relationship with Egemet as determined and authorized by Egemet within the framework of applicable law and regulations.

Business partners and suppliers shall protect personal/Egemet company data against unauthorized and illegal use, disclosure, access, loss, damage, alteration and destruction.

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Business partners and suppliers accept and agree that non-compliance with this hereby terms and conditions of confidentiality may constitute unfair competition as per Turkish Code of Commerce and may be subject to administrative/punitive sanctions stated in Turkish Penal Code Article 239 and related regulations.

Within the framework of the Law no 6698 regarding Protection of Personal Data, business partners and suppliers agree, accept and undertake to use personal data strictly at the level required for maintaining the relationship between the parties and for the duration of time that the use of such data is obligatory; inform individuals regarding the use of their personal data in line with the applicable law and regulations; obtain required permits and approvals from individuals in the stated format and in line with the regulations; not to make any alterations/editing on the data; not to use the data for any purpose other than maintaining the commercial relationship between the parties; not to disclose, make available, assign to third parties or transfer the data on domestic or international level and that they are obliged to delete/destroy such data upon termination of contract. Business partners and suppliers must inform Egemet of any situation where the international transfer of personal data is obligatory for the enforcement of a contract and obtain company's written approval for the procedure.

7. FORCED LABOR&CHILD LABOR

Egemet complies with any laws and regulations that ban forced labor, child labor, exploitation, and all other means of modern slavery. Egemet's suppliers and business partners cannot support or engage in child labor or any means of forced labor including human trafficking, burdening with debt etc. Egemet complies with Minimum Age Agreement (ILO Agreement 138).

8. ORGANIZATION

Egemet, respects the right to organization, within the framework of applicable laws and regulations. Egemet employees are free to use their rights to association, membership to their preference of legal associations or unions in a peaceful manner. Egemet expects its suppliers and business partners to show the same level of respect to their employees right to association.

9. SAFETY, HEALTH AND ENVIRONMENT

Egemet strives towards creating a safe and healthy work environment for all its employees, as determined by the standards in the related legislation, at minimum.

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Egemet is committed to the principle of creating a safe and healthy environment for both its employees and visitors at the facilities and protecting the environment by striving to keep the environmental impact of its activities at a minimum level. Such commitment may only be realized by the cooperation and collaboration of Egemet employees in assuring fulfillment of safe business operating procedures, protecting health and safety of oneself and others, implementation of environmental pollution control mechanisms stipulated by law and strict compliance with safety procedures for the disposal of industrial waste and hazardous materials.

Egemet's policy is based on working in full compliance with all related safety and environmental law and regulations and establishing a collaborative relationship with the enforcement and inspection staff of related institutions. Employees must immediately inform their supervisor of any unsafe, unhealthy or environmentally hazardous conditions.

Use of alcohol, drugs and/or addictive substances is strictly banned at the work place and Egemet facilities. Should the use of such substances outside company premises have a negative impact on the employees' performance and Egemet's reputation or pose a threat to the health and safety of others, company management may resort to corrective action.

Egemet expects its business partners and suppliers to provide a safe and healthy work environment for their employees, in line with the international standards and human rights.

Business partners and suppliers are responsible for keeping health and safety violations and occupational accidents at a minimum level, provide employees with appropriate PPE and take corrective action when and where necessary.

Egemet is committed to mitigate the direct and indirect environmental impact of its business operations and strive to improve environmental conditions.

Egemet expects its business partners and suppliers to determine the environmental impact of their operations and take appropriate action to mitigate greenhouse emissions, improve level of environmental responsibility, assure effective waste disposal, and promote efficient use of natural resources.

10. COMBATting BRIBERY AND CORRUPTION

Egemet is committed to honest and ethical business practices in its operations as well as national and international law and legislation on combatting bribery and corruption. Egemet has banned all means of bribery and corruption related to third parties in both public and private sector business operations. The company operates in full compliance with related laws and regulations and does not tolerate any form of bribery, for whatever the purpose may be. It is strictly forbidden to offer/give valuable gifts to obtain a service or benefit for Egemet or to request/accept any valuable gift/bonus/award etc. in return for providing/implementing an activity or benefit for Egemet. Such activities shall be treated as bribery. Bribery in all forms such as money, gifts, entertainment, expenditures, political or charity donations, mutual benefits or any other means of obtaining direct/indirect benefit is banned.

1. Gifts and Entertainment

Gifts may be given to show gratitude or as part of business etiquette. All gifts given to third parties by the company are offered publicly and in goodwill. The same principles govern receiving of gifts. Only gifts of symbolic value given to the company (not to individual employees) shall be accepted.

In cases where giving/receiving a gift may create/lead to the interpretation of conflict of interest, the gift cannot be given or accepted, even though it may fully comply with the conditions determined by the policy. Gifts may come in different forms: cash, gifts to family members, gift cards, travel, dining, accommodation, entertainment, covering credit card expenses, debt or loans, personal favors, business opportunities, employment, healthcare services etc. may be regarded as gifts.

Small, symbolic gifts may be given to the employees of companies and institutions where Egemet has business relationships. Nevertheless, the gift cannot be in the form of cash or cash substitutes, given in return for a specific action or prevention of it. The gift must be in line with the terms and conditions of national law as well as company regulations, be presented in transparency and registered as determined by company procedures. In the case that employees would like to present a third party a gift that exceeds the value of 60\$, they must first obtain written approval of the Staff and Administration Manager. Egemet may cover the accommodation, entertainment and travel expenses of a business partner only when such expenses are related to the marketing of Egemet products and services or execution of a contract. Travel and entertainment expenses must be of an agreeable amount within the framework of related legislation and company rules and regulations. Egemet staff may entertain third parties at any

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business environment. Travel expenses of family members or friends shall not be covered. Gifts and entertainment activities for business purposes by Egemet and its affiliates must be duly documented, including accurate definition of activity and receiver of gift/entertainment service and authorization.

2. Donations

Corporate and/or personal donations/payments/contributions to political parties or their candidates, state officials or private sector that may be associated with the company activities, benefits to the company in the form of supplying/purchasing of services or influencing a decision are banned. Any political or charity donation/sponsorship by Egemet must comply with the applicable legislation, be an act of goodwill and supported by Egemet Ethics Principle.

Employees must obtain written approval of the Staff and Administration Manager prior to making any political or charity donations on behalf of Egemet.

For all charity donations the following Egemet procedures must be followed:

- The employee wishing to make the donation must send a request by e-mail to Egemet Staff and Administration Manager, including an explanation of the intended purpose of donation/contribution and beneficiary's bank account details. A power of attorney document signed by the beneficiary's legitimate representative must be attached to the e-mail.
- Egemet Staff and Administration Manager shall review and assess the request for compliance with related law and regulations and Egemet policies.
- Egemet Staff and Administration Manager shall deliver to the company management documentation of donation/contribution's compliance with related law and regulations and Egemet policies alongside a letter explaining the purpose of the donation in relation to the charitable intentions of the company.
- Company management will review and assess the request, and deliver a document of company approval or rejection of the request.
- If the donation is approved, the beneficiary of the donation or their legal representative shall sign a document of receipt.

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Egemet defines facilitation payments to state officials (even if their role has expired) for routine processes (expediting the obtaining of permits, approvals, licenses, visas, posts or infrastructure etc.) even in the smallest amount, as a payment (cash or in kind)

When working with Egemet, business partners and suppliers must not be involved in any action/process that may be associated with bribery and/or corruption of any kind (including improper payments). This includes facilitation payments or offering/accepting preferential treatment for/on behalf of Egemet.

When working with/for Egemet, business partners and suppliers must not offer/accept gifts, preferential treatment by state officials (even if their term of office has expired) or officials of private sector and legal institutions.

Suppliers and business partners accept and undertake to take necessary measures to refrain from bribery and corruption and to act in accordance with national applicable laws and regulations as well as Egemet Policy on Combatting Bribery and Corruption. Egemet expects all its suppliers and business partners to fulfill their responsibilities regarding social and ethical requirements in their business operations of manufacturing goods and providing services.

Egemet's commitment to comply with the legislation against bribery and corruption expands to cover the actions of its representatives, proxies and business partners. Egemet shall pay due diligence in combatting corruption. Similarly, its representatives and proxies accept and undertake to fully comply with the related laws and regulations.

Egemet includes in its definition of corruption any illegal/criminal act, misfeasance, giving/receiving unfair advantage and all means of payment or other incentives to lead to corruption. Egemet defines bribery as anything (including non-monetary benefits such as internship/training opportunities) that is given/received/offered/promised/accepted or encouraged in return for execution of an illegal /unethical/ inappropriate act or used as an incentive/bonus/award etc. to influence the decision-making process or judgement of the executor.

11.CONFLICT OF INTEREST

In cases where an employee, representative, proxy or third parties acting on behalf of Egemet is faced with a risk of being influenced in their decision, execution of a task or acting against the interest of the

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company due to personal benefits, the situation may result in conflict of interest. For instance, engagement of an employee in a commercial relationship with a third party involving personal or financial ties (acting as owner of the company, shareholder, member to board of managers, employee or consultant etc.) by themselves or close family members may result in conflict of interest. Whenever there is a risk of conflict of interest the employee must inform their supervisor to determine whether the employee must be exempted from certain Egemet activities in order to protect the interest of the company.

Egemet reserves the right to assess existing or potential conflict of interest cases and sensitive areas that may pose a risk in the process of business operations prior to any agreement of providing services and during the course of service.

Egemet defines %conflict of interest+ as any situation that raises doubts about objectivity in providing of services or in relationship with Egemet activities. Egemet defines %sensitive areas+ as any risk that the company may face regarding its business, reputation or client relationships.

Business partners and suppliers shall immediately warn Egemet of any suspicion they may have regarding existing or potential conflicts of interest in/for their business with Egemet.

Depending on the circumstances, business partners and suppliers may have to take appropriate measures to manage the case of conflict of interest/sensitive situation. In cases where suppliers and business partners work with or have a business relationship with Egemet's competitor companies in the industry, they are expected to comply with their obligation of confidentiality and refrain from any action that may cause harm to Egemet's interest.

12. MONEY LAUNDRING

Money laundering involves attempts to conceal the source of financial gains related to an illegal act and it is a serious crime as it is closely related to the financing of terrorism and constitutes basis for the execution of other serious crimes. It is strictly forbidden for employees to engage in/facilitate any activity that involves concealing of funds. Employees may only engage in legal business activities and must refrain from accepting/dealing with any cash or its substitutes that raise suspicions regarding funds being derived from a crime.

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Egemet is strictly against all forms of financial crime including money laundering and financing of terrorism.

Egemet defines %financial crime+ as illegal activities with the purpose of monetary gain and %money laundering+ as masking the true source of an earning. generated through illegal activities- and processing it through a legitimate business. This definition includes concealing, acquiring, processing, using, keeping in reserve and facilitating the control of such earning.

Business partners and suppliers must refrain from providing Egemet goods /services directly or indirectly related to financial crime or facilitation of it, including money laundering. Business partners and suppliers must refrain from any agreements, funding or other means of support to illegal activities (terrorism, tax evasion, corruption etc.)

Within the scope of Turkish Criminal Law no 5549, regarding the prevention of laundering of crime revenues, no 4208 regarding prevention of money laundering, related regulations and applicable occupational norms, business partners and suppliers are liable to inform Egemet of their necessary and appropriate sources of income, any changes to these sources and final partners/real beneficiaries of the income.

13. COMPETITION

Egemet is in a position to compete in various markets where the majority of the companies are subject to competition laws (sometimes referred to as %antitrust legislation+), which aim to regulate the principle of fairness in the relationships between companies, clients, competitors and suppliers as well as inhibiting acts that may cause limits/constraints to competition. Such acts are not limited to official or written agreements, but also include unofficial negotiations.

Egemet's competition policy requires full compliance with related regulations regarding fare competition at all times.

Regardless of the varying competition legislation systems Egemet, its employees, managers, representatives and proxies must refrain from the below activities:

- Price/rent fixing,
- Discrimination against clients or suppliers without objective justification,

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- Engaging in agreements or commitments with competitors to define/assign regions or markets in the area of competition or restricting the production/supply of products,
- Restricting the supply of a product/service to the purchase of another product/service that is unbesought,
- Binding the sale/purchase of a product/service to the condition that the seller or buyer does not engage in business with competitors,
- Discussing/negotiating Egemet's commercial activities (pricing, sale/purchasing terms and conditions, clients, suppliers, markets etc.) with competitors.

In the light of the above, any meeting/discussion with competitors must be terminated at once, where a sensitive/ inappropriate topic is raised regarding commercial data. In addition, it is forbidden to request or share sensitive information including trade secrets with/about competitors via any means of communication (phone, mail, post etc.).

14. REPORTING OF VIOLATIONS, CONCERNS AND COMPLAINTS

1. Wrongful acts

Wrongful acts refer to the actions of an employee, manager, proxy or representative for/on behalf of Egemet, in violation of Egemet rules of conduct and/or related legislation. Wrongful acts include, but are not limited to, corruption, bribery, abuse, stealing Egemet property, fraud, underhanded demands, constraint, slander, exploiting Egemet property, neglecting execution of a task on purpose or other severe negligence, acting in violation of this hereby Ethics Policy and Rules of Conduct or any other Egemet policy and procedures, laws and related regulations, all Egemet policies, rules of conduct, internal regulations, workplace rules and terms of contracts/agreements signed by Egemet.

Retaliation against employees who feel uneasy about or fear reporting others' wrongful acts or who refrain from reporting such acts is also a wrongful act.

2. Protected disclosure

Protected disclosure is a communication of goodwill, with the purpose of correcting an act/behavior that does not comply with this hereby Ethics Policy and Rules of Conduct. Protected disclosure includes information/data in proof of the wrongful act.

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3. Disclosing Party

%Disclosing party+refers to the individual/institution that reports the wrongful act. Disclosing party may be an Egemet employee, supplier, applicant or the community. Disclosing party neither acts as a court board nor determines any corrective/amendatory actions.

Disclosure in goodwill means that the disclosing party will be protected against all negative behavior/approach. Thus, please feel comfortable about disclosing wrongful acts, as your identity will be kept confidential unless you/related regulations demand otherwise.

4. Reporting

All employees, representatives and proxies must report any cases of violation/potential violation of Ethics Policy and Rules of Conduct immediately to the Staff and Administrative Manager at asimsek@egemetforge.com or Deputy General Manager at ndogan@egemetforge.com.

Egemet encourages the written notification of suspected wrongful acts to have a clear understanding of the case. In the case of an oral notification, the Staff and Administrative Manager shall prepare a meeting document and keep a record of the notification.

Third parties may contact Egemet Staff and Administrative Manager and/or General Manager regarding any wrongful act that Egemet might be involved in.

Any means of negative approach or behavior toward the disclosing party shall be treated as a severe case of disciplinary act. If you have any concerns that you or other colleagues are faced with such approach/behavior you must immediately report the issue to the Staff and Administrative Manager and/or General Manager.