ETHICS PROCEDURE

1) Purpose

The Code of Ethics Policy is prepared to cover all of Erciyes Çelik Halat A.Ş. businesses and operations and to provide guidance in implementing and outlining the framework for the ethical rules and principles that all employees, business partners, and suppliers are expected to comply with, as well as the governance structure related to these matters.

2) Principles and Guidelines

2.1) Legal Responsibilities

2.1.1) The Company designs its investments and facilities in accordance with applicable legislation and regulations to conduct its operations sustainably and protect the environment, going beyond legal requirements where possible. In carrying out all domestic and international activities, the Company acts within the framework of laws and international legal rules, cooperates with all public institutions and organizations, and provides any requested information, documents, or notifications accurately, timely, and in an understandable manner.

2.1.2) The Company demonstrates diligence in complying with all regulations related to its operations, particularly financial and environmental legislation, and expects the same from third parties and institutions with which it collaborates. In its dealings and communications with public officials, the Company always acts honestly and does not attempt to influence their decisions through gifts, assistance, bribes, or other unethical offers.

2.2) Responsibilities Towards Customers

2.2.1) The Company's primary objective in all areas where it operates and conducts business is to meet customer expectations at the highest level. In this context, it continuously works to anticipate customer needs accurately and develop new products that enhance their quality of life and promote responsible consumption. The Company constantly renews and improves itself by taking customer satisfaction and all feedback received from customers into account. With a customer-focused approach, it strives to respond promptly to all customer needs, requests, and expectations, and to resolve any arising issues as quickly as possible.

2.2.2) The Company guarantees the confidentiality of all its customers' personal data and undertakes not to share this data with third parties without the customers' consent, except as required by law or court orders. The collection, use, processing, and storage of customers' personal data are carried out in a manner that ensures their privacy rights and complies with relevant legal regulations.

2.2.3) Timely delivery of services under the promised conditions is one of the Company's fundamental principles. The Company addresses both internal and end customers with respect and courtesy, maintaining a transparent and honest approach. It ensures that all commercial agreements with customers are structured to avoid misunderstandings and adheres to the principle of transparency throughout pre-agreement processes.

2.3) Responsibilities Towards Employees

2.3.1) Employees are the fundamental pillars of the Company. Therefore, the Company values its employees as its most important resource and acts with an approach that ensures they work under good conditions, in harmony, with job satisfaction, and a sense of ownership over their work.

2.3.2) The Company evaluates candidates in recruitment processes based on objective criteria. Selections are made according to the requirements of the position, talent, and competence, providing equal opportunities to all candidates. From recruitment to career development and compensation practices, the Company ensures that no employee faces discrimination based on personal characteristics such as language, religion, ethnicity, or gender, and does not allow any violations in this regard.

2.3.3) The Company takes all necessary measures to create a safe working environment within its operations and workplaces. It complies with the requirements of relevant legislation and implements any additional measures deemed necessary. The Company provides mandatory and voluntary training on occupational health and safety and ensures continuous access to training materials.

2.3.4) The Company ensures that employees can fully exercise their legal and contractual rights. It respects freedom of representation and collective bargaining rights.

2.3.5) The Company supports the personal and professional development of its employees by providing the necessary training. It values employees as individuals, maintains the confidentiality of their personal information, and uses such information only within the scope required by law.

2.4) Responsibilities Towards Competitors

2.4.1) The Company believes in the principles of a free market and acts to maintain a competitive structure in all its business activities, including pricing, terms of purchase and sale, discounts, and customer selection. It competes lawfully and ethically, avoiding unfair competition. The Company does not attempt to obtain confidential information about competitors, does not rely on information received through illegal means, and does not use such information. It refrains from making any statements or taking any actions that would disparage or harm the reputation

of its competitors. The Company respects the intellectual property rights of competitors and expects them to act in the same manner.

2.4.2) In all marketing activities, including advertising, products, services, and promotions, the Company acts in accordance with legal regulations and general ethics, in a truthful and honest manner. It avoids any actions that could damage the reputation of Erciyes Çelik Halat and refrains from including statements or expressions in announcements, notices, or advertisements that would disparage competitors or their products.

2.5) Responsibilities Towards the Community and Humanity

2.5.1) Within the scope of its Sustainability Strategy, the Company aims to create sustainable value for its stakeholders and acts to contribute to the goals of the Sustainable Development Goals (SDGs). Through its activities and sustainable development strategy, it contributes positively to the communities in which it operates. The Company respects human rights and the values of different societies, ensuring that its operations in Turkey and abroad do not conflict with generally accepted lifestyles, worldviews, and traditions.

2.5.2) In the communities where it operates, the Company works to improve education, culture, economic development, and social well-being. It avoids any practices that violate human rights, including the illegal employment or exploitation of children, abusive treatment of workers, forced labor, and similar practices, and expects all suppliers and business partners to comply with these standards. The Company terminates commercial relationships with any individuals or organizations found not to uphold these principles.

2.5.3) The Company refrains from including elements in its advertising that violate fundamental societal values, such as sexual abuse or violence, or that may encourage harmful behaviors. It does not produce advertisements that demean any political view, religion, language, or ethnic group.

2.6) Responsibilities Towards the Environment

2.6.1) The Company conducts its operations based on principles of respect for the environment and environmental protection, ensuring full compliance with relevant environmental legislation and standards, and works to minimize its environmental impact in line with its sustainability strategy.

2.6.2) Recognizing that fulfilling environmental responsibilities also means fulfilling responsibilities towards employees, society, and humanity, the Company operates with environmental awareness in all its services and activities, maintaining its facilities at standards that do not cause environmental pollution.

2.6.3) Within the framework of its sustainable growth strategy, the Company develops and implements methods to minimize the long-term adverse environmental impacts of its operations. During all production processes, including the construction infrastructure of its facilities and utilities such as heating, cooling, electricity, and water, the Company keeps natural resource consumption to a minimum. It invests in energy efficiency to reduce its carbon footprint.

2.7) Information Security and Social Media

2.7.1) The Company is committed to complying with all legal regulations, legislation, and standards specified in ISO 27001 regarding information security and personal data. “Information” is defined as all data, text, images, audio, and similar content produced, used, transmitted, archived, or legally received by the Company in physical or digital form. This includes, but is not limited to, strategic information, organizational information, commercial, technical, financial data, customer and distributor information, policies, procedures, regulations, product and service information, employee personal data, and all other related information.

2.7.2) All non-public and work-related information within the Company is considered confidential and shall not be shared with third parties outside the Company except as required for the performance of the employees’ duties. Within the Company, transparency is a guiding principle, but information is shared only to the extent required by the employee’s role.

2.7.3) All information developed by employees, acquired by the Company, or generated in the course of business belongs to the Company and is considered a trade secret. This includes written, printed, electronic, or software-based information related to the Company’s products, services, financial data, technical information, business development, customers, suppliers, and employees, as well as any other non-public data.

2.7.4) All employees are individually responsible for the proper operation of information security systems established to protect confidential information. Employees exercise due care to prevent the loss of any information and/or documents they access or use in the performance of their duties and to ensure the accuracy and integrity of such information and/or documents.

2.7.5) Employees acknowledge that all information (financial data, customer information, personnel records, etc.) and documents they access in the course of their duties are confidential and must not be shared with third parties (anyone outside Erciyes Çelik Halat). Employees act in accordance with principles of loyalty, confidentiality, and non-competition.

2.7.6) Social media is widely used within the Company to facilitate communication and meet business requirements. Social media and internet services are primarily for business purposes and may be used personally only to a limited extent. Employees

are aware that all information accessed and transmitted electronically is monitored and controlled by the Company. Employees are responsible for protecting passwords used for internet access and email services.

2.7.7) In addition to the general principles stated above, specific examples and situations regarding the use of information security and social media tools may be outlined as follows.

2.7.7.1) Regarding Information Security, Employees Shall:

Give utmost importance to the confidentiality of information that is classified as confidential and/or a trade secret, adhering to principles of loyalty and non-disclosure.
Report any information security breaches, vulnerabilities, or suspicious situations within the Company to the relevant unit or personnel.
Protect confidential and private information of employees, customers, suppliers, business partners, and other associated individuals or organizations, and refrain from using such information for purposes other than business.
Not share or use for personal purposes any information or documents acquired in the course of their duties, either inside or outside the Company.
Not use any knowledge or documents obtained after leaving the Company against the Company or in favor of competitors.
Respect and protect intellectual property, including patents, trade secrets, copyrights, names, and trademarks.
Remember that leaking any confidential information or documents for insider trading or financial gain is strictly prohibited.
When certain information must be shared with third parties for business purposes, ensure that it is done in a manner that does not harm the Company (e.g., under confidentiality agreements), with prior notification to the Information Security/related unit and approval from a supervisor.
Recognize that the Company-provided email account is assigned for business purposes and may be monitored.
Not use technological communication tools provided by the Company for personal purposes.
Avoid any actions that could threaten the physical or environmental security of PCs, laptops, servers, or similar information processing and production devices.
Ensure that information and documents requested by Regulatory Authorities or Independent Auditors are shared accurately, clearly, and on time according to Company procedures.
Contact the Information Security Unit immediately in case of unauthorized, accidental, or unintended access to, exposure to, or sharing of confidential information.
Allow individual visitors reasonable access, and in such necessary cases, meetings should take place in the cafeteria, canteen, or designated meeting room with approval from the unit manager.

Not remove any electronic or written document containing information or data outside the Company for non-business purposes (managerial approval is required if necessary).
Be aware that only the Information Technology Department has permission to install software on the system and refrain from installing or using programs that allow sharing or downloading music, images, videos, or similar content from the internet.
Not send “chain letters” via email.
Exercise all necessary care and attention to ensure the proper use, sharing, storage, accuracy, and integrity of all information and documents. Actions must comply with the published **Information Security Policy**, and employees are required to review and follow the detailed provisions outlined in that document.

2.8) Relations with Suppliers and Customers

2.8.1) Employees must not derive personal benefit from commercial transactions with suppliers or customers, must not use Company information or their positions for personal gain, must not compete commercially with the Company, and must not maintain close relationships with any person or organization that could benefit from information obtained through their duties. In this context, employees may not become owners or partners of any supplier with which the Company has direct business relations or of any competitor.

2.8.2) In business dealings with organizations owned or co-owned by an employee’s relatives, parallel business terms must be applied as with other suppliers/customers, and compliance must be demonstrated through periodic internal audit reports. Such relationships must be entirely outside the employee’s personal scope of duties. Even if all conditions are met, explicit approval from the General Manager of the relevant Company is required.

2.8.3) Employees must not engage in lending, borrowing, guarantees, or any other financial interest relationships with suppliers, customers, or competitors. Social interactions with suppliers/customers must not compromise professional business relationships, and personal purchases from suppliers must not involve advantages beyond normal commercial conditions.

2.8.4) As a principle, the Company does not accept gifts from business partners. However, gifts received from (or given to) business partners may be accepted if they comply with commercial practices and the Company’s Donation and Assistance Policy, are made in good faith, and do not affect the objectivity of decisions. Any uncertainties should be resolved in accordance with the limits and rules specified in the Donation and Assistance Policy.

2.8.5) The Company works to raise awareness among its suppliers regarding environmental, social, and broader sustainability issues. When selecting suppliers,

minimum environmental and social criteria are considered, and suppliers failing to meet specific human rights standards are not engaged.

2.8.6) In addition to the general principles above, the following specific considerations apply:

Employees may not use their position or authority within the Company to gain personal or private benefits for themselves, their families, or third parties.
Employees in the Company's procurement functions must not establish personal business relationships with suppliers they interact with in the course of their duties.
If a former employee becomes a potential supplier, no commercial relationship may be established between the individual and the Company for two years, except with specific approval from senior management. If the individual had previously been involved with a supplier as a partner, existing contracts must be reassessed in accordance with the Ethics Committee's recommendations.
Employees may not request that any supplier, with whom they have business dealings due to their role in the Company, hire relatives or acquaintances.
Employees may participate in activities organized by customers or their institutions, provided these remain within acceptable limits and the Company's senior management is informed.
During meetings where business matters are discussed and reviewed, meals or other necessary expenses may be covered by customers or suppliers if required for the business context.

2.9) Use of Company Resources

2.9.1) Company resources consist of movable and immovable assets, any material benefits obtained through Company facilities, as well as human and information resources. All use of resources on behalf of the Company must consider the interests of the Company. The Company provides employees with all necessary and appropriate resources to fulfill their professional responsibilities.

2.9.2) Employees agree to use the resources provided to fulfill their professional responsibilities responsibly and solely for the benefit of the Company. In particular, the employment of human resources must align with the Company's interests, and assigning employees to personal tasks of managers constitutes a violation of this principle.

2.9.3) Employees are expected to use all vehicles, equipment, materials, and facilities assigned to them for business purposes only, with due care, and without causing damage. Examples of misuse include, but are not limited to:

Conducting long personal calls on a Company-provided phone.

Incurring excessive or unnecessary expenses during business travel.
Assigning Company personnel's working hours to personal tasks of a manager.
Using a Company vehicle for the benefit of third parties not directly related to the Company.
Engaging in any behavior that hinders the use of shared areas or damages fixed assets.

2.10) Responsibilities of Managers

2.10.1) All professionals holding managerial positions within the Company must possess the necessary skills, experience, qualifications, training, and expertise to perform their duties and responsibilities effectively. In addition, all managers must act transparently, responsibly, efficiently, and honestly, executing their work in alignment with the Company's interests and the principle of excellence. All managers are obligated to continuously improve the skills and capabilities mentioned above.

2.10.2) Managers at all levels adopt the Code of Ethics and serve as role models in ensuring its adoption among their subordinates. In this context, managers:

Encourage subordinates to ask questions, share concerns, and discuss matters related to the Code of Ethics.

Take every ethics-related consultation seriously and, if necessary, promptly report the matter to the Ethics Committee.

Design business processes to minimize ethical risks while fully considering ethical procedures during the execution of their responsibilities.

Are aware of internal instructions and regulations, monitor all updates, and inform their subordinates accordingly.

Immediately notify senior management of any matters with legal implications for the Company and do not seek individual solutions.

Act proactively in taking initiatives related to their responsibilities and do not consciously avoid using their authority and responsibilities.

2.10.3) All managers within the Company operate in full compliance with applicable laws, regulations, and the Company's policies and procedures. In this context, they:

Adopt and implement the Environmental Policy and promote behaviors aimed at protecting the environment.
Ensure diversity and inclusion, combat discrimination, and adhere to the Human Rights Policy in all decision-making processes.
Follow occupational health and safety practices and take all necessary measures to prevent workplace accidents and occupational illnesses.
Apply the Human Resources Policy, related procedures, and requirements in all employee recruitment, evaluation, and training processes.
Managers not only implement these principles themselves but also lead by example in raising awareness and fostering adoption among their teams.

2.11) General Responsibilities of Employees

2.11.1) Every individual within the Company is valuable, and their unique lifestyle and worldview are respected in the workplace. The main ethical principles that all employees of Erciyes Çelik Halat are expected to follow under the Code of Ethics are outlined in the main document. This section specifies, in general terms, the attitudes and behaviors that each Erciyes Çelik Halat employee should demonstrate in the workplace, particularly in the office environment.

2.11.2) Employees shall:

Refrain from physically, psychologically, or socially harassing or disturbing their colleagues and avoid any violent behaviors or actions.

Not use drugs, stimulants, or alcohol in the workplace and must not come to work under the influence of these substances.
Borrow only from legally authorized institutions and avoid personal debt or surety arrangements that could harm the Company's reputation.

Abstain from theft, abuse of authority, forgery, fraud, defamation, bribery, embezzlement, and other disgraceful acts, and fulfill their duties and responsibilities to the state in accordance with public law.

Return all information and documents related to their duties in full when their employment with the Company ends.

Perform their duties and responsibilities, as defined in their job descriptions, with due diligence and good faith, minimizing errors.

Be aware of and comply with assigned working hours, notify their manager or Human Resources if arriving late or absent, and not alter working hours without proper authorization.

Participate in planned training sessions and organized meetings.

Report any observed violations of company procedures to their supervisor and/or the relevant department.

Full-time, contracted, or part-time employees shall not work for competitor companies in similar sectors, whether during paid or unpaid leave. For other secondary work, consultancy, or paid positions outside the Company, employees must inform their manager and consent to any evaluations regarding conflict of interest, loyalty, and performance.

Recognize that misleading, incorrect, or exaggerated communication impedes effective messaging and therefore strives to communicate clearly and accurately.

2.12) Evaluation of Non-Compliance

2.12.1) Employees shall not physically, psychologically, or socially harass or disturb their colleagues, nor engage in any violent behavior or actions.

2.12.2) As illustrated by the examples below, unethical situations and behaviors may arise in various forms:

Managers giving unethical instructions or guidance to subordinates.
An employee engaging in behavior that violates ethical rules or the Company's values.
An employee witnessing a colleague acting in a manner contrary to ethical rules or the Company's values.
Business partners (customers, suppliers, etc.) making unethical offers or requests to employees through their owners, managers, or staff.
Employees making unethical offers or requests to business partners (customers, suppliers, etc.).

2.12.3) If employees become aware of or suspect any violation of ethical rules or Company values, they must report this information to their immediate supervisor and, if necessary, to the members of the Ethics Committee. When an employee identifies a behavior that may be unethical or potentially inconsistent with Company principles and professional business ethics, they should evaluate it by asking themselves the following questions:

2.12.4)

Is the behavior contrary to the Company's principles and business ethics?

Does the behavior violate professional standards or the rules stated in the Code of Ethics?

Does the behavior conflict with the interests of the Company?

Could the behavior result in negative consequences for the Company if disclosed to the public, customers, or other stakeholders?

Is the behavior clearly in violation of laws or corporate regulations?

If an objective third party outside the Company witnessed this situation, would they perceive it as unethical?

2.12.5) Employees should analyze the situation, and if the answer to one or more of the above questions is "yes," they must report the matter to the appropriate authorities.