

OBEL CIVATA COMPANY ETHICAL POLICY

As employees, each of us has a responsibility to act with integrity and uphold our ethical principles. We are expected to be honest, reliable, and trustworthy in all our interactions, and to comply with ethical business practices at every stage of our work.

At Obel Civata, the fundamental purpose of our Ethical Policy can be summarized as follows:

"As representatives of the company, we are required to act honestly, fairly, and respectfully at all times and in all matters."

Company principles;

Integrity: Remaining faithful to facts and acting honestly and transparently toward one another, our customers, the communities we operate in, our suppliers, and our shareholders.

Truthfulness: Communicating what we truly mean, delivering the products we commit to, and standing by what we believe is right.

Respect: Recognizing that our workforce is composed of diverse individuals, each unique in their own way, and treating one another with equal respect and consideration.

Trust: Building confidence through open, sincere, and collaborative communication within our teams.

Responsibility: Speaking up without hesitation when behaviors conflict with our regulations or company principles, reporting such issues to the relevant parties, and seeking clear and guiding information whenever encountering a questionable situation.

Citizenship: Complying with all laws of the Republic of Türkiye and the foreign countries with which we conduct business, and fulfilling our responsibilities to help improve the communities in which we live.

1- Conflict of Interest

Situations in which the interests of the company conflict with personal benefits, or where employees gain inappropriate personal advantages due to their position—or provide benefits to their relatives or third parties—are considered conflicts of interest.

It is essential that OBEL CIVATA employees avoid any situation that may create a conflict of interest. Using the company's resources, reputation, identity, or authority for personal gain—along with any actions that may negatively affect the company's name and image—must be strictly avoided.

To prevent such issues, employees are expected to comply with the following principles:

- 1- Employees shall avoid any situation that may create, or give the appearance of creating, a conflict of interest for themselves or their relatives, and shall not participate in decision-making processes involving the personal interests of themselves or their close relations.
- 2- Employees shall not engage in any personal financial relationship with customers or suppliers, nor shall they use business relationships to obtain personal benefits. They shall not succumb to pressures that may result in adverse outcomes for the Company, shall not accept special benefits from customers or suppliers, and shall not act as an intermediary between customers or suppliers for transferring benefits.
- 3- Employees shall devote their time and effort to the Company. They shall not assume any other responsibility that may create a conflict of interest, and shall not work for any other natural or legal person outside of Obel Civata.
- 4- Employees shall not use any information obtained through their duties in a manner that may result in unjust or improper gain.

2- Information and Data Accuracy

Accurate and well-maintained business records are essential and critical for conducting our operations. In this context, employees are responsible for ensuring the accuracy and legal compliance of all records, documents, and documentation related to any transactions carried out on behalf of the Company. These records form the basis for the execution of the Company's activities and for fulfilling its obligations toward employees, suppliers, customers, and official authorities.

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3- Company Resources Utilization

Company assets are to be used solely for business purposes and may not be used for personal reasons. All assets, equipment, vehicles, computers, software, and similar items provided to employees for the execution of daily operations are recorded through inventory and delivery forms. No employee shall use these assets for personal gain or for the personal gain of others.

4- Protection of Informations

Confidential information belonging to the Company must never be used or disclosed by employees for personal purposes. Such information is the property of the Company, and it is the responsibility of employees to protect it.

OBEL CIVATA is committed to protecting the personal information of its employees and all stakeholders.

In this context, all personnel records and all email correspondence conducted on behalf of the Company are securely maintained by the relevant departments. In addition, employees are responsible for the proper use and security of the computers assigned to them and the user credentials for any company software.

- Employees of OBEL CIVATA must adhere to high ethical standards when using Information Technology (IT) and communication resources, and must comply with all applicable laws and regulations.
- OBEL CIVATA reserves the right to report any illegal use of IT and communication resources to the relevant authorities at any time.
- Use OBEL CIVATA's IT and communication resources for personal purposes only on a temporary and limited basis. Do not use the OBEL network or data storage areas for entertainment or to store personal data.
- If the IT and communication systems for which you are responsible are used by others on your behalf, remember that you remain responsible for their proper use. Do not upload, download, transmit, or access pornographic, obscene, or otherwise inappropriate material, or any material that may cause anger, discomfort, or unwanted distress to your colleagues.
- Include the OBEL name or logo in business-related correspondence, but do not use it in personal emails.

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- Do not install software or add hardware to workplace computers without prior authorization if necessary.
- OBEL CIVATA's IT and communication resources must never be used for illegal or unethical activities, including intellectual property infringement, cybercrime, accessing gambling sites, or conducting personal business.

5 – Corruption - Confidentiality - Competition - Customer and Supplier Relations

- All of our employees exercise accuracy, consistency, reliability, and helpfulness in their interactions with the Company, its business partners, and customers. They demonstrate care and attention to ensure true information flow with our customers and suppliers. Each employee represents OBEL CIVATA in every setting. We believe that our success depends on honesty, ethics, and mutual trust in our relationships with customers. Our Company's approach to quality, as well as our knowledge and level of innovation in the industry, are key factors that determine our competitiveness. With this awareness, it is our responsibility to serve our customers effectively and to improve our suppliers to the same standard.
- If you suspect or have confirmed any corruption in activities conducted within OBEL or with any partner company or individual doing business with OBEL, report it to OBEL immediately.
- Do not engage in business with individuals suspected of criminal activity, nor trade in proceeds of crime. Report all suspicious transactions or individuals to OBEL. (OBEL will report to the authorities when deemed necessary.)
- Do not obtain, use, or hold goods or monetary assets derived from criminal activity. Do not conceal the origin or nature of criminal proceeds. Do not facilitate the acquisition, ownership, or control of such assets. Do not disclose information related to an ongoing investigation. Do not alter, conceal, destroy, or discard any relevant documents.
- Information and documents provided by the Company or accessible to employees due to their position—including trade secrets, non-public financial and other information, employee personal data, and the content and specific terms of contracts with third parties—are considered confidential and subject to the protection of trade secrets. Any violation will result in immediate enforcement of all applicable measures in accordance with relevant regulations and procedures.

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- Employees, upon leaving the Company for any reason, shall not use any documents, records, or information obtained during their duties and position to gain advantage for themselves or competitors against the Company.
- The use of any confidential information or documents belonging to OBEL for "Insider Trading" is strictly prohibited. Employees must not leak such information or use it to gain benefits through the stock market or any other means.
- All official disclosures are made in accordance with the principle of equality to investors, partners, and the public, as determined by the Company and communicated through senior management, ensuring completeness, simultaneity, and clarity.
- OBEL employees are obliged to exercise the utmost care in protecting the confidentiality and private information of their customers, suppliers, business partners, and other relevant individuals or organizations they work with.
- You must not make agreements with OBEL's competitors regarding prices or any price-related elements (such as discounts, rebates, or additional charges).
- You must not agree with other market players to refrain from competing in specific markets or with certain customers or accounts.
- You must not interfere with tenders or bids, nor agree with competitors to boycott any customer or supplier, except in cases of international sanctions.
- It is prohibited to make agreements with competitors to reduce or fix production, capacity, or output. Additionally, you must not enter into agreements with independent intermediaries or resellers to set minimum product sale prices.
- Anti-competitive behavior undermines OBEL's business and reputation for fairness and integrity. Such practices are unacceptable and, in many countries, considered illegal, potentially resulting in severe fines and imprisonment.

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6 – Accepting/Giving Gifts

Employees must not accept gifts or benefits that could influence their impartiality, decisions, or behavior, nor make direct or indirect attempts to provide gifts or benefits that could create such influence for third parties or organizations. Employees may not solicit gifts from individuals or organizations that have a business relationship with the Company. No gifts, money, checks, property, complimentary vacations, special discounts, or similar benefits that could obligate the Company may be accepted.

- OBEL employees must not request, and must never accept, any gifts, benefits, assistance, hospitality, special discounts, commissions, or rebates that could influence their impartiality, decisions, or behavior for their own personal gain.
- OBEL employees shall not accept gifts from individuals or organizations with whom the Company has a business relationship, except for those whose symbolic value is unquestionable.

Employees;

- Employees are prohibited from accepting cash or cash-equivalent gifts of any amount, borrowing from suppliers, consultants, competitors, or customers, or accepting travel, event, or similar expenses covered by such persons or organizations as a form of gift.
- OBEL employees may not give gifts to individuals or organizations with whom the Company has a business relationship, except for promotional items prepared for marketing purposes.
- The offering, giving, or receiving of bribes and/or commissions is strictly prohibited under any circumstances.
- Gifts and promotional materials provided by OBEL to customers or other third parties in a business relationship must be approved by the OBEL General Manager.
- Employees must never offer, give, request, or accept personal payments, gifts, or favors in exchange for preferential treatment or to gain a business advantage.

ASK YOURSELF: Have you ever offered, given, or received money, gifts, or favors to influence a business decision? If your actions were made public, would you be concerned about them? Are you considering, or have you ever made, a donation that could be considered an inappropriate payment? Does a gift or hospitality you accepted create a sense of obligation toward the giver? Was the gift given as an exceptional award, or as an incentive for a specific request to be fulfilled? Is the gift or hospitality illegal or inappropriate? Does the timing of the gift or hospitality coincide with a sensitive period, such as a business negotiation?

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The following situations must always be documented:

- All gifts and hospitality offered, except for items of negligible value, such as a cup of coffee,
- Any gifts or hospitality that could be perceived as creating a conflict of interest,
- All gifts and hospitality received or given by third parties that exceed the permitted value limits,
- All gifts and hospitality that exceed the permitted value limits and are refused,
- Ensure that colleagues you work with understand that bribery and corruption are unacceptable practices.

All gifts and promotional materials to be provided by the Company to customers, distributors, and other third parties in a business relationship must be approved by the Company's Board of Directors.

7 – Respect, Equality, and Work Environment

OBEL CIVATA employees treat each other with respect. No employee shall engage in behavior that harasses other employees, customers, or suppliers, or that damages the property of others. OBEL CIVATA fully respects the personal and family life of its employees.

The Company is responsible for providing a safe, healthy, and productive work environment and takes the necessary care to protect employees' personal information.

"All employees are treated equally, without discrimination based on race, language, religion, age, gender, sexual orientation, nationality, or any other legally protected category."

Any behavior that is unwanted, unwelcome, or not reciprocated by the recipient constitutes harassment. This includes, but is not limited to, any sexual solicitation or messages that create a sense of threat or coercion for the recipient. Any aggressive or mocking behavior directed at an employee with a physical disability is considered disability harassment. All employees are expected to exercise appropriate care and respect in their interactions with one another.

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Abuse of authority

Abuse of positional power may arise from the misuse of an employee's individual authority (such as title, physical, personal, or age-related power) or collective power (derived from numerical superiority). Reasonable and justifiable mistakes made by employees, when addressed with an appropriate and constructive approach, as well as performance evaluations aimed at employee development within the performance system, do not constitute abuse of power.

All employees are required to act in accordance with these principles in all OBEL business processes and interactions.

To achieve a health, safety, and environmental performance we can be proud of, we are committed to protecting our employees and the environment while aiming to develop energy-efficient products and services aligned with these objectives. In this context, we seek to contribute to sustainable development and to earn the trust of our customers, shareholders, and society.

- All OBEL employees must comply with health, safety, security, environmental, and social performance requirements.
- Each business unit should aim to provide lasting social benefits; protect the health and safety of employees, suppliers, and the local community; minimize potential disruptions to society; and use energy, water, and other resources more efficiently.
- Employees must treat colleagues and external parties with respect and fairness in accordance with OBEL's core values, priorities, and Business Ethics Principles. Differences should be valued, and discrimination of any kind is strictly prohibited.
- Ensure that decisions regarding recruitment, evaluation, promotion, training, development, discipline, compensation, and termination are based solely on required qualifications, merit, performance, and business considerations. Do not discriminate based on race, color, age, gender, sexual orientation, marital status, disability, ethnic origin, or nationality. Be aware of relevant laws and local cultural factors that may impact workplace decisions.
- OBEL aims to be a symbol of reliability and integrity for its partners, shareholders, employees, suppliers, business partners, competitors, the environment, society, and humanity.
- OBEL employees interact with one another openly, respectfully, honestly, and responsibly when sharing ideas and opinions.

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- The spirit of teamwork promoted throughout OBEL is based on the sharing of information resulting from all business activities, while ensuring compliance with confidentiality rules.
- Making unfounded or baseless statements, engaging in gossip, or disparaging colleagues is contrary to OBEL's ethical values.
- In conducting OBEL business, employees must respect individual rights and cultural differences.
- All forms of corruption, bribery, and harassment (including mobbing) are strictly prohibited within OBEL. Employees who witness or are subjected to such behavior should seek support from the Human Resources department to report their grievance or complaint to the relevant authorities.
- If there is a clearly verifiable case of psychological and/or physical harassment, the employer is obliged to take the affected employee's claim seriously. This obligation arises from the employer's legal duty to protect employees, as established under the Constitution, Civil Code, Code of Obligations, and Labor Law. Legal action should be considered only as a last resort.

Although behaviors that may constitute harassment can vary widely, some illustrative examples are provided below:

Verbal Harassment: Unwelcome comments, nicknames, jokes, or hurtful remarks about an employee's race, gender, nationality, age, religion, belief, disability, or similar characteristics, or about their personal values.

Physical Harassment: Any unwanted physical contact, actions, or behaviors that could be perceived as negative, including sexual in nature; continuing unwanted contact with malicious intent; or deliberate actions intended to obstruct or harm another individual.

Visual Harassment: Disrespectful and/or sexually suggestive or inappropriate images, drawings, posters, films, or hand/arm gestures.

Psychological Harassment (Mobbing): Structured, systematic, and intentional behaviors aimed at discouraging the targeted employee from their job, reducing their performance, damaging workplace relationships, or ultimately pressuring them to leave their position. Examples include: criticizing the employee's private life, repeatedly interrupting them in group settings, constantly reprimanding them in front of others, or ignoring and downplaying their achievements.

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- Company resources and facilities may not be used to support political activities. Political activities cannot be conducted within the Company, and donations to political parties or support for political campaigns are strictly prohibited.
- Employees participating in political activities are expected to make it explicitly clear that they do not represent OBEL in any way.
- Political, social, and religious opinions should not be expressed or discussed in the workplace.
- Employees are, in principle, not allowed to work a second job outside the Company. However, employees are encouraged to fulfill their social responsibilities. Employees may be permitted to serve in management positions or as instructors in associations, foundations, professional, or educational organizations, provided they comply with the relevant regulations and/or procedures at OBEL and obtain prior approval.
- Employees may not engage, directly or indirectly, in activities that would classify them as merchants or tradespeople (“Commercial Enterprise” or “Artisan Business”).
- Employees must always avoid using OBEL’s name, corporate identity, reputation, or authority for personal gain.
- All employees are responsible for protecting and enhancing the Company’s reputable image. In this context, they must ensure that their personal conduct and behavior comply with laws and general ethical standards.
- Employees may not use confidential or non-public information about the Company for their own benefit or that of others.
- All communications you initiate must have a direct link or benefit to OBEL. Ensure that your communications are necessary and appropriate. Make certain that you adhere to all rules and comply with all OBEL procedures. Failing to safeguard information may damage OBEL’s reputation and impair the Company’s ability to operate effectively.
- The “F068 PROCESS INTERACTION TABLE” and “F116 SPECIAL CUSTOMER COMMUNICATION TABLE” forms outline the periods and methods of business communications that OBEL CIVATA conducts with both its employees and customers.
- Do not provide misleading information, speculative comments, exaggerations, or casual remarks on sensitive or confidential matters in your business communications. Do not make jokes on serious issues. Clearly indicate the source of the communication and ensure full

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compliance with all relevant standards and guidelines.

ASK YOURSELF: If your communication were visible in a public forum, would you feel comfortable? If your communication were used as evidence in legal proceedings, would you feel comfortable? Is your communication legal? Is this communication necessary? What is the most appropriate way to communicate this information?

- The individuals authorized to communicate, provide assessments, and express opinions on behalf of OBEL with analysts, capital market professionals, and media representatives—including making written or oral press releases to print, broadcast, or similar data distribution channels—are the Chairman of the Board, the Deputy General Manager, and Board Members.
- The Human Resources Manager ensures that every new OBEL employee receives this Ethics Handbook as part of the onboarding program. Employees are instructed on the procedures to follow if they observe behavior that violates the ethics rules. Employees also sign an acknowledgment confirming that these rules are considered an integral part of their employment contract.

8 – Respect and Protection for the Environment

At OBEL CIVATA, we recognize the importance and value of a healthy and clean environment. Our employees are expected to correctly apply health, safety, and environmental principles in every location where the Company operates. We are committed to planning, constructing, and operating workplaces that protect our employees and available resources. This commitment also includes the proper use of personal protective equipment, taking necessary precautions, and ensuring that work is performed safely.

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9- Compliance with Business Ethics Rules

OBEL's published and shared "Values and Priorities" are listed below:

VALUES

- Adopt a management approach that is **ETHICAL and RELIABLE**.
- Pursue continuous improvement with a **QUALITY-ORIENTED** approach.
- Embrace **SUSTAINABLE GROWTH** through **EFFECTIVE USE OF RESOURCES**.
- Manage with an understanding that **VALUES EMPLOYEES** and recognizes them as the Company's most important asset.
- Act responsibly toward the **ENVIRONMENT AND SOCIETY**, fulfilling obligations with the highest sense of accountability.
- Aim for operational excellence with a **QUALIFIED AND ENGAGED WORKFORCE**.
- Adopt **CUSTOMER ORIENTATION** as a core part of the Company culture and conduct all activities accordingly.

OBEL CIVATA employees must take all necessary measures to prevent any violation of the rules. All employees should report any suspected violations to their managers or the Human Resources Directorate.

We must remember that we are all members of one large family. As members of the OBEL CIVATA family, we should value these rules to ensure that we live with honesty, respect, and care, and constantly ask ourselves whether we are doing what is right.

By maintaining this attitude, our work will inevitably be more efficient, and our motivation will be higher.