

We, as Mitaş Industry Inc., comply with the sector's ethical professional principles and professional code of conduct in all our activities and processes. As we commit by participating in the United Nations Global Compact, we fully adapt to the human rights, working conditions, universal principles related to environment and decent society. We attach particular importance to ensure that these principles which we internalize are applied by all our stakeholders. We support social development and environmental protection.

Our basic principles guide us in all our operations and actions.

- **Honesty:** We abide by the principle of honesty in all our works and activities, relations with our stakeholders and business partners.
- **Reliability:** We provide explicit, comprehensible and exact information to our employees, stakeholders and business partners.
- **Objectivity:** We do not treat our employees, stakeholders and business partners with prejudice due to gender, behavior, idea and ethnic origin; we do not discriminate under any circumstances.
- **Compatibility:** We comply with all laws, regulations and standards regarding to occupational, consumer and public health and safety, and environment.
- **Transparency:** We inform our employees, stakeholders business partners and public fully, exactly and timely excluding confidential information.
- **Protecting Social Benefit:** In all our processes, operations and investments, we protect the issues of social benefit, sector's development, and sustainability in line with our Company's image, benefit and profitability.

We acknowledge that the rules we have to abide by regarding our approach and operations are not limited to the aforementioned issues and it is not possible to put all the ethical principles into writing. In case of encountering a situation other than those written here, we act in the light of our basic principles and consult our superiors about uncertain situations.

We acknowledge that we have to abide by the ethical principles as a whole for maintaining the Company's success and protecting its reputation. Even the action of one of us against such ethical principles may affect our reliability and operations before our stakeholders. Thus, when we encounter an action or process against our ethical principles or we have a suspicion, we absolutely inform the breaches to our superiors. This is as important as acting in accordance with the ethical principles.

Cenk ALKAN
President

OUR STANDARDS OF BUSINESS CONDUCT POLICY

A. Business Practices

Legal and Social Responsibility

We ensure that our actions comply with and are within the meaning and intent of all applicable laws and regulations. We ensure that our actions are free from suspicion and criticism and have no unfavorable effects on society.

Dealing with Governments

We act in accordance with honesty, accountability and transparency in our relations with the official authorities; take care of submitting the information, documents and records requested for control and audit in accordance with the legislation correctly, completely and timely.

In our relations with government institutions, we express clearly that all kinds of bribery and corruption are unacceptable by our company and that we do not finance initiatives for drugs and gambling.

We comply with the laws and regulations against corruption and bribery, ethical and professional principles and universal rules applicable in all the countries our companies are operating and exercise due diligence on compliance with this policy.

Our statement for fighting against corruption and bribery covers all our employees including the Executive Board, subsidiaries and affiliates and their employees, outsourcing companies which we procure products or services and their employees, the persons and institutions acting on behalf of the Company including suppliers, consultants, lawyers and external auditors.

Dealing with Customers, Suppliers and Professional Organizations

Serving customers is the focal point of our business. We approach our customers with honesty, transparency and reliability.

We act with integrity and do everything possible to provide great service to our customers, either directly or by supporting the work of other individuals or business units.

We inform our customers regarding their rights and obligations fully, accurately and timely. We take care of making clear explanations to them, we do not use exaggerated, misleading statements, and do not give incomplete and incorrect information. We do keep away from all kinds of behaviors and attitudes to be perceived as the breach of customer rights.

We do not make commitments, which we cannot fulfill, related to the products and services to the customers. We adhere to our promises and do not allow impairment of reliability.

We explain to our customers the benefits, costs and potential risks related to the products and services they use clearly and timely.

We solve the customer complaints as soon as possible and take the necessary measures to prevent reoccurrence of such complaints.

We do not discriminate among our customers on issues such as race, gender, belief, religion, ethnicity, nationality, political opinion, age, disability, etc. We do not get into religious, political, ethnical and such discussions with our customers.

Fair Competition

Provided that secrets of customers and other companies are not violated; we exchange correct, complete and comprehensible information with the professional organizations within the scope of legislation and principles of our companies.

We acknowledge that intervening in the free markets and prices of products and tools in these markets or trying to disturb the competitive environment is unacceptable.

In our announcements and advertisements, we act in accordance with the legal regulations and public morality, honestly and realistically; we do not include statements and expressions unflattering other companies or products and services; we avoid all kinds of actions to damage their respectability and reputation.

We avoid all kinds of practices that may cause unfair competition regarding staff recruitment.

Conflict of Interest

Conflict of interest may be defined as the situation in which an employee himself, his relatives or companies or persons with which he has relationship take a role or a task in the business relation with our companies, thus causing conflict between the employee's self-interest and the interest of company, or occurrence of such a perception.

Based on this definition, we comply with the basic principles regarding;

- Non-business activities,
- Corporate opportunities,
- Business relations with the parties,
- Personal business relations,
- Charities, grants and contributions,
- Gift acceptance,
- Political activities and financial contributions.

However, we are aware that situations that may cause or be perceived as conflict of interest are not limited to the aforementioned issues. Thus, we assess our processes and actions based on;

- whether it will be perceived as conflict of interest by the others, and in case of occurrence whether it will put us and our companies in a difficult situation,
- whether it will affect our objectivity or it will be perceived as breach of objectivity, if not,
- whether our stakeholders' will be negatively affected,
- whether it will negatively affect our duties and responsibilities.

Charities, Grants and Contributions

We may participate in non-profit associations, foundations, cooperatives with the professional organizations like Chamber of Commerce, Stock Market; however, we do not use our companies' names, facilities and assignments during our duties in the non-profit organizations.

We never make donation requests or similar requests from the customers or other employees even on behalf of the association or various institutions.

We acknowledge that the consent of competent authorities is required for the grants and donations to be made.

We make sure our personal donations to the non-profit organizations to be confidential, voluntary and not to be related to our business.

Gift Acceptance

We never accept gifts other than low priced, symbolic gifts from our customers, suppliers and other persons and institutions. We particularly do not accept gifts, which may be perceived as effector in our decisions to be taken on the business.

Laundering of Assets Arising from Crime

We are aware of our legal obligations and social responsibility regarding laundering, terrorism financing and other crimes.

B. Workplace Environment**Human Rights**

We acknowledge that everyone is entitled to the basic human rights stated in the United Nations-Declaration of Human Rights such as the right to live, be free, be in safety, not to be tortured and treated badly, to fair and impartial trial, privacy, settlement and travel, marry, acquisition of property, think and declare ideas, participate in the public administration by general and equal vote, has freedom of association, equally benefit from the public services, work under fair and equal conditions, rest and paid annual leave, social security, fair and equal education, participate in and benefit from scientific, artistic and cultural activities, religion and conscience.

We strictly prohibit human rights violations, including slavery, forced labor, child labor, human trafficking, and workplace abuse, related to our own operations, our supply chain and our products.

In this context, respect to human rights is our priority.

Discrimination and Harassment

We do not allow an employee to be subjected to discrimination and harassment on the issues such as race, gender, belief, religious, ethnic origin, political opinion, age, disability and etc.

We do not make an employee do our personal works incompatible with his duties, authorities and responsibilities.

We acknowledge that career development is based on capacity and performance; and we act accordingly.

We do not allow mobbing in the workplace.

Safety and Business Continuity

We ensure that everyone at our workplaces shows a maximum effort to comply with all health and safety policies for providing safety at the workplace.

In case of fire, natural disaster or other emergencies, we apply our business continuity plan to continue to meet our customers' requirements.

Protection against Risks

We are aware of the fact that one of the most critical issues is effective risk management. We assess the possible results of our processes and risks we undertake; take care of our activities to comply with the general risk policies and risk management principles.

C. Use of Corporate Information and Property**Use of Trademark**

We acknowledge that our trademarks are one of the most precious assets.

We acknowledge the rules and practices related to use of these trademarks and do not use the names, logos and trademarks of our companies outside our work as a rule.

We do not cause loss of reputation of our trademarks in our works and activities.

Corporate Information

We protect confidentiality of our corporate information and prevent access of unauthorized persons for sustainability of our activities and performance. Confidentiality and information security are also requirements of legal regulations and their violation is subject to legal sanctions.

We do not express any opinions, disclose confidential information on behalf of our Company without the knowledge and consent of the related department in the organizations such as conference, panel, seminar and so on that we are provided to participate in due to our assignment or for training purposes.

We do not disclose confidential information; we do not let our own ideas and opinions shared in the negotiations and talks be perceived as our Company's in the organizations we participate in out of working hours such as training, course, conference, seminar, panel and etc.

We meet the non-business, social / personal demands without using the name of our Company.

We act responsibly for providing the security of information in this era when data communication channels are highly developed.

Customer Information

We do not misuse customer information that we have due to our position.

We acknowledge our responsibilities on providing the confidentiality of customer information; provide the security of such information and do not share such information with anyone other than legally authorized persons and institutions.

We act responsibly for providing the security of information in this era when data communication channels are highly developed.

Other Information

We acknowledge that the information related to our employees, suppliers, and stakeholders are private and confidential. We do not share such information with the unauthorized persons, and take necessary measures to prevent access of unauthorized persons to such information.

Internet and Social Media

We do not forget that we represent our companies while using the internet and social media. We do not get involved in any connections humiliating and discrediting our companies.

We act in accordance with the regulations such as copyrights and fair use; we do not share the written and visual contents, which are against the laws and legislation or including crime elements.

D. Community Involvement

Environmental Commitment

We take care of efficient use of natural resources and minimizing the wastes arising from our processes.

We fully comply with the environmental law and regulations. We encourage our stakeholders to develop awareness on this issue. We request the companies, which we do business with to take the necessary measures on this issue.

We conduct activities to encourage our employees and stakeholders to support recycling and reuse activities and to promote awareness on this matter.

We cooperate internationally and support transparency policy to decrease greenhouse gas emission.

In the selection of procurement of products and services, we prefer suppliers, which work by using social and environment-friendly activity /production systems.

Sustainable Procurement

In the selection of procurement of products and services, we prefer suppliers, which have social and environment-friendly activity / production systems.

We expect our suppliers to conduct their relationship with us on a fair and ethical basis and in compliance with our core principles of sustainability in this code of conduct.

Social Contribution

As an extension of sustainable development and social contribution, we put the social contribution activities into practice in accordance with the requirements and demands of physical and social environment we live in; we develop social responsibility projects in the fields of culture, art and education.

Political Activities and Financial Contributions

We do not actively participate in any political party and institutions, which are extensions of such parties; avoid any kind of action which may be seen as financial support to these political parties.

E. Voicing Concerns

We make communication channels open when our employees and business partners think a conflict exists between our standards and an applicable law, rule or regulation, or if they have a question concerning the legality of our conduct. They are free to raise concerns promptly through the following options:

- Contacting / reporting senior management
- Complaint boxes

Reports can be made anonymously. Anyone who retaliates against an employee who raises concerns is subjected to disciplinary action, up to and including termination.