

ANNEX – 13 CODES OF CONDUCT AND VE BUSINESS PRINCIPLES 13

It has been accepted by the Board of Directors Decision dated 06.07.2020 and numbered 2020/27.

Article 1: Purpose and Scope

Aydem Codes of Conduct and Business Principles define the rules, employee rights and also the company's ethical valuation and basic principles that Aydem Yenilenebilir Enerji Anonim Şirketi ("Aydem" or "Company") and all third parties and employees acting on behalf of the Company must comply with.

Ethics, in its simplest terms, examines the universally accepted value judgments that have general validity in human relations. Business ethics, on the other hand, encompassed the entirety of principles developed to guide behaviors in the business world.

While Aydem's fundamental core values and principles guide our business ethics rules, our codes of conduct in other words, they constitute our expectations, standards and ethical practices that form the basis of all our business relationships and transactions.

Article 2: Responsibilities of the Employees

The honesty and integrity of the employees are essential in order to maintain the reputation, reliability and successes acquired by means of role modeling of the company management. Any behavior that is unethical or not in compliance with the business principles is never acceptable or such behavior is never tolerated. It is the duty of every employee to protect the reputation and success of Aydem.

Each employee should work at the utmost professional level in order to meet the needs of internal and external customers within the scope of the job under his / her responsibility. Moreover, the employees by working efficiently must contribute to their own goals, to the goals of their department and the Company, and to meeting the customer needs.

Each employee especially should;

- i. Act within the framework of basic moral and humanitarian values and corporate strategies while performing their duties,
- ii. Act with honesty and reliability; establish and maintain equal relationships between individuals; cooperate with other employees for common purposes and use the assets and resources of the Company effectively, efficiently and respectfully,
- iii. Demonstrate proper conduct of behavior and business ethics in accordance with the "Codes of Conduct and Business Principles" announced throughout the corporation; read, understand and comply with all the principles of the corporation,
- iv. Comply with all the laws, principles as well as the bylaws and regulations in force issued by the relevant regulators (Energy Market Regulatory Board, Capital Markets Board, etc.) and professional institutions and organizations to which Aydem is a member of, in fulfilling the assigned duties,
- v. Avoid unfair competition in all transactions and relations with other financial institutions within the framework of honest competition principles,
- vi. Not forget that being clear, complete and accurate to all stakeholders is a part of our identity and reliability, and should always act in a manner that increases the reputation of Aydem.

Every employee is obliged to act in common sense and show the necessary effort, to take into account the principles of profitability and efficiency, and to avoid all kinds of actions and transactions that may harm the corporation. It should not be forgotten that acts that violate or exceed the limits of the

"Codes of Conduct and Business Principles", which are regarded as the guarantee of the reputation of the corporation, may lead to ethical review or disciplinary investigation.

The corporation expects managers and all employees to make judgments in accordance with our "Codes of Conduct and Business Principles" while conducting their business. It is important for the executives and for all employees to frequently refer to these rules, to frequently confirm that they are proceeding on the path in line with the " Codes of Conduct and Business Principles " guide and with the purposes of its content, and to fulfill their duties in the most effective and correct manner in line with the corporate objectives.

As the corporation, we recognize that the rules stated in this guide do not provide a full answer for every question and for every situation. Therefore, in such cases or regarding any questions or concerns about the "Codes of Conduct and Business Principles", you may contact the Ethics Committee Representative and Human Resources Management.

The communication channels established to report your questions about the "Codes of Conduct and Business Principles" and those who violate the "Codes of Conduct and Business Principles" or any suspicious situations that may reduce our reputation are as follows:

E-mail: etik@aydemyenilenebilir.com.tr

Telephone: 0850 575 0 575

Post delivery: To the "Ethics Committee" at Denizli address on our company's website

Article 3: Confidentiality

Article 3.1: Ensuring Confidentiality Within the Corporation

Our Employees;

i. Every employee is obliged to comply with the details specified in the Aydem Information Security Procedure and the relevant legislation regarding information security.

ii. Except for the disclosure of information and documents requested by authorized persons or institutions specified in the law and other legal regulations, unauthorized use of personal and financial information of customers, suppliers or of an employee is strictly forbidden.

iii. They may not share the information they have learned and the documents they have acquired as the result of their work with unauthorized persons and authorities within and outside the corporation for whatever purpose, and cannot use such directly or through a third person for speculative purposes.

iv. They know that the project, technical infrastructure, regulations, etc. they have developed due to their duties. are the property of Aydem; they cannot take these and similar materials out of the corporation without the written approval of the highest level manager of the relevant Company.

v. They do not disclose their personal rights, which should only be acknowledged by them, with other people inside and outside the corporation.

vi. They avoid any criticism about the general policies Aydem that could damage the reputation of the Company.

vii. Apart from their duties, they cannot discuss matters related to their duties and do not cause any situation that may lead to speculation and negative assessments.

viii. In the event that the employee leaves his/her job in the company for any reason, the responsibility of protecting the personal and financial information of the customers continues. It is forbidden to take confidential information out of the corporation, to share it with third parties or to use such information for personal business outside the corporation.

Article 3.2: Protection of Personal Information of the Customers

The compliance of our employees with professional conduct standards that ensure the relationship and information confidentiality between the corporation and its customers is very crucial in terms of the reliability and reputation of Aydem. Discussing or talking about confidential information about customers or transactions outside of normal business activities and in public areas where they might be overheard by third parties or mentioning of such subjects may cause breach of this confidentiality. Personal information accessed by our employees for business purposes should be used in accordance with the Personal Data Protection Law ("KVKK/PDPL") and the legislation supporting this law, company policies and procedures.

The use of information arising from duties or in-house authorities is limited to situations that are absolutely necessary for the legitimate and appropriate business objectives of Aydem.

Consumption, address and identity information of the eligible consumers should never be shared in the interest of other retail / wholesale electricity sales companies.

Furthermore, information about how our daily business works (such as our strategic plans and products) and non-public information about customers should be used with care and meticulously. Even the slightest implication in this respect may cause misunderstandings.

The obligation of Aydem to protect the confidentiality of information shall continue even in case the corporation pulls out from work for any reason.

Article 3.3: Information on Company Property

Non-public information, transactions, computer software, technical information, materials, records, files, documents, programs, reports, reviews, data, customer lists, trade secrets and all other information about the Company customers and other third parties are the property of Aydem and cannot be used except for work purposes.

Our employees cannot disclose this information to any third party. Under no circumstances, this information shall be allowed to be known by any competitor or any third party or be disclosed to such during or after the service.

The equipment and goods allocated to the employees of the Company due to their duties shall not be considered as private belongings. Moreover, the Company reserves the right to audit the user accounts of the employees and the electronic communication means such as e-mail, telephone, computer systems and other electronic records assigned to them for business, based on existing laws.

Article 3.4: Information Storage

It is the responsibility of our employees to be aware of all policies regarding the safe management, distribution, transfer, storage or disposal of information. All of our employees are obliged to act in accordance with the provisions of the "Information Security Policy" published / to be published by the corporation, except for the issues stated below.

As an Aydem employee, we are expected to comply with the following basic policies:

Restricting Access to Confidential Information

I. All computer access should be limited to the information required to perform the daily tasks. If there is a need to share information with people outside the company, this issue should be questioned in detail, and if necessary, the situation should be discussed with the Information Security Management and the relevant Ethics Committee Representative.

- ii. When sharing information with authorized persons, the necessary information should be provided at the required level.
- iii. Confidential information should be stored where only authorized persons can see and access it. When not in active use, documents containing confidential information should be securely stored in drawers or cabinets, and should not be left on fax machines, printers and other unsafe locations.
- iv. When distributing such information within the corporation, envelopes labeled as "Personal" should be used.

Protecting Information on Computer Hardware

- i. Laptops and other portable devices are extremely vulnerable to theft. Such portable devices (computer, tablet, cordless phone, mobile phone, etc.) should not be left in unsafe places. In the event of the loss or theft of the device under the liability of the employee, Information Security Management and Human Resources Management should be notified as soon as possible.
- ii. Our employees must lock their computers or log out of the system before leaving their computers.
- iii. User IDs or passwords are personal and should not be shared with anyone. Our employee can be held responsible for all the use of the user ID or password, including any unauthorized use, and for any damages to the corporation that may arise from any misconduct. In cases where user identity or password is suspected of being compromised; passwords should be changed and Information Security Management should be contacted.
- iv. The configuration of the computer's antivirus program provided by the company cannot be changed. It is our employee's responsibility to protect the computer allocated by the company from computer viruses that are sent to the employee from outside the company and that may reveal company information.

Article 4: Internal and External Relations of the Company

Article 4.1: Relations with Government and Public Institutions

Within the scope of this article, the principles specified in Article 5.2 of the Bribery and Corruption Policy shall be applied.

Article 4.2: Relations with Customers, Suppliers and Other External Organizations

Our employees act within the framework of integrity principle in their relations with customers, shareholders, affiliates and other companies while representing the company.

As Aydem, our main goal is to meet the needs of our customers. Customer satisfaction determines the success or failure of our corporation and therefore; our customers are the most important part of our business. Customer relationship management in the Company is based on the principles of professionalism, courtesy and more importantly, graveness and reliability, as ensuring the customer satisfaction is the best advertising tool we can perform. Honesty, equality and compliance with laws should be kept at the utmost level in customer relations.

Employees must provide full and clear information to the customers about the Company products and services. Employees do not have the right to provide false information in order to make higher profits. Our customers are clearly informed about the rights and obligations on their transactions related to Aydem and the benefits and risks of the products and services offered to them. Therefore, our employees have the responsibility of being equipped with knowledge both on Aydem and on the services and products provided by the Company and its subsidiaries.

Sales or communication techniques that are inconsistent with professional codes of conduct (ethics), that provide incorrect or incomplete information to the customer about the product or service and that make use of efforts to force the customer in the decision process cannot be used.

In addition to taking into consideration the corporate interests in the activities carried out within the free market economy; in general, the employees as well avoid behaviors that create unfair competition in the energy sector, within the framework of the principles of continuous trust, efforts for the development of the sector, and observance of common interests. Employees also do not express positive or negative opinions or make comments about competitors and their products and services during their duties.

The company avoids practices that create unfair competition, such as abuse of the dominant position in the sector, price determination by creating a cartel, price discrimination and price fixing, barrier to entry, market transparency and industrial espionage.

Relations with suppliers are also based on the above-mentioned rules.

Confidentiality requirements should be clearly secured by a contract in dealing with persons or organizations from which consultancy services are obtained. However, the temporary employment of the personnel whose duty in the company is terminated shall be subject to the proposal of the relevant business unit manager and the evaluation of the Human Resources Director and the approval of the General Manager.

Any Aydem employee shall not make a real or visible commitment on behalf of Aydem, officially or unofficially, without authorization in accordance with the approved procedures, and shall not work with those who damage public morality and harm the environment and public health.

All company employees should refrain from any activity, practice or action that would violate competition law, in particular abuse of the dominant position.

Article 4.3: Media Relations

In Aydem's relations with the press, our employees should avoid situations that may lead to any speculation, negative evaluation, and the practices and behaviors that may damage the trust, reputation and stability of our corporation or the industry or create unfair competition.

In public and in areas where the audience thinks we are speaking on behalf of the Company, we express only the views of our company, not our own opinions.

Press relations regarding the entirety of Aydem shall be carried out by the Corporate Communications Directorate. All external relations shall be maintained within the procedures determined by the Company. All requests, interview requests and all questions from the written and verbal media should be immediately forwarded to the Corporate Communication Directorate in Aydem.

Regarding all contact information to be provided to third parties, priority approval of the Corporate Communications Directorate should be obtained. Only authorized persons can communicate about Company and its policies, practices and procedures.

In the posts made on social networking sites, blogs, dictionaries, forums, e-mail groups, we avoid expressions that may give the impression that they are shared by third parties representing Aydem.

Moreover, the "Aydem Digital and Social Media Management Procedure" published to represent the corporate structure through social media, is essential.

Article 4.4: Conflict of Interests

Aydem does not prevent its employees from engaging in external activities which will not cause the employees to neglect their internal responsibilities, which will not restrict their actions in accordance

with the interests of the corporation, and which will be in compliance with the "Codes of Conduct and Business Principles" announced. However, our employees involved in such activities should avoid possible or actual situations that conflict with the Company and their own interests.

"Conflict of Interest" occurs when the personal interest of an employee and the Company interest affect / hinder each other. For example, the responsibilities or liabilities of an employee in a situation of self-interest outside the corporation or in his/her private life may make it difficult for him/her to fulfill his/her responsibilities and duties in the Company objectively/impartially and in an effective manner. Conflicts of interest may also arise when a family member of an employee gains a personal benefit from the employee's position in the Company.

Any transaction or relationship that may create any conflict of interest should be reported to the Ethics Committee Representative.

In order to prevent possible conflicts of interest, our employees should;

- i. Refrain from giving rise to situations that might create a conflict of interest or the impression in favor of themselves or in favor of their relatives, and do not take part in the decision-making process in matters concerning their own or their relatives' interests.
- ii. Not enter into any personal financial relations with customers and suppliers, and should not gain personal interest through business relationships.
- iii. Not allow gifts or offers of interest that could affect their own decisions and consent or create a conflict of interest.
- iv. Use the company's assets and resources efficiently only for the interest and benefit of the corporation.
- v. Use their time and effort for the corporation, should not assume any other responsibility that may create a conflict of interest, and should not work with any other natural or legal person outside the Company.
- vi. Act in line with the principles of honesty and transparency in their relations with public institutions and organizations, and maintain the distance and impartial relationship.
- vii. Protect corporate and customer secrets and should not take out information that provides competitive advantage and is proprietary to the company.
- viii. Not use the information they have obtained as the result of their duties in a manner that lead to an unfair gain.

Article 4.5: Corporate Opportunities

Our employees at all levels are required to act in common sense and put in effort as necessary while performing their duties, to take into account the principles of profitability and efficiency and to avoid any actions and transactions that may harm the company. Our employees are obliged to use these legitimate business opportunities whenever an opportunity arises in favor of the corporation.

Employees cannot make decisions or engage in activities that are contrary to the interests of the Company or are incompatible with the responsibilities of the employees. If a potential conflict arises, the employee must immediately report the situation to the Ethics Committee Representative.

Our employees should refrain from not exploiting any opportunity to the benefit of Aydem, which has been reached by using the property or information belonging to Aydem or obtained as a result of their position in the Company, or to preventing other employees from doing so because they are contrary to their own interests.

Article 4.6: Prohibition of Borrowing

Our employees should not borrow money from, utilize any benefit or enter into a bail relationship with the customers and the third parties, during the performance of their duties or in connection with these duties under any way circumstances.

Our employees should manage their private and financial affairs in a responsible manner and should not bear any debt burdened which they cannot pay. Our employees should demonstrate a balanced and harmonious attitude both in their professional lives and in their personal financial situations.

It is forbidden to enter into a debit-credit relationship between subordinate and senior employees and for the employees with customers, suppliers and contractors.

Article 4.7: Bribery

Within the scope of this article, the principles specified in Article 5.1 of the Bribery and Corruption Policy shall be applied.

Article 4.8: Political Activities

Within the scope of this article, the principles specified in Article 5.2 of the Bribery and Corruption Policy shall be applied.

Article 4.9: Political Donations

Within the scope of this article, the principles specified in Article 5.5 of the Bribery and Corruption Policy shall be applied.

Article 4.10: Acceptance of Gifts

Within the scope of this article, the principles specified in Article 5.4 of the Bribery and Corruption Policy shall be applied.

Article 5: Transactions

Article 5.1: Accuracy of Records

Within the scope of this article, the principles specified in Article 5.8 of the Bribery and Corruption Policy shall be applied.

Article 5.2: Stock Transactions of the Employees – Insider Trading (Misconduct of Information)

It is natural for our Company to have certain expectations from its employees within the framework of the principles of protecting the company's interests with the duty of loyalty. In the context of these expectations;

It is possible for employees to carry out investment transactions with their shares of Aydem in the stock exchange, under the conditions specified in the regulations of the Capital Markets Board. However, the employees should be aware that using any kind of confidential information belonging to Aydem or giving it to third parties, including making direct or indirect stock trading, will constitute insider trading and that these behaviors are accepted as illegal by the law. Internal procedures established to implement the regulations of the Capital Markets Board are applied with precision. Employees included in the list of "Insiders (people with insider information)" are expected to be in full compliance with the relevant legislation, Company policies and procedures.

Employees of Aydem, except for the persons specified in the aforementioned circular, may participate in public offering transactions made by companies within Aydem and other intermediary institutions.

Article 6: Company Resources

Article 6.1: Use of the Company Assets and Resources

All kinds of properties, assets, equipment, vehicles, computers, computer programs and the like owned by the Company and provided to the employee in order to carry out the daily tasks shall not be used by any employee for personal benefit or for the personal benefit of another person.

Company telephones, personal computers, photocopy and fax machines, supplies, postal service, e-mail, bulletin boards and meeting rooms are mainly for company use. The use of specified resources or other company resources for personal purposes may disrupt the flow of information which is very important.

Company phone and company address, e-mail, internal communication and message system should not be used for personal correspondence and conversations. Utmost care should be taken to keep private phone calls short.

We take corporate interests into consideration when using resources on behalf of the company and its subsidiaries, and show sensitivity in protecting the company assets. We avoid loss, damage, misuse and waste of the assets of the company and its subsidiaries. We do not use company assets and opportunities outside of company business, regardless of being under any name and on behalf or benefit of anyone, without the benefit of the company. In cases where there is a public interest or an obligation, the approval of the General Manager of the relevant business unit shall be sought.

Article 6.2: Use of Technology

Aydem Internet and Intranet system is for business transactions, communications and research related to work. It may not be used for other than these purposes (watching TV series / movies, etc.) and/or for obscene, pornographic, terrorist purposes. In addition, unlicensed software should not be installed and used by employees on company computers. Under no circumstance, any messages that contain harassment, threatening content or that would damage the reputation of the Company can be sent with mobile devices belonging to the Company.

Article 6.3: Assignment Out of the Company

Employees shall not be engaged in activities that require them to be directly or indirectly regarded as merchants or tradesmen (regarded as "Commercial Enterprise" or "Tradesman Business"), shall not serve as a board member or auditor in companies other than Aydem and its subsidiary companies without the written approval of their top manager, and may not work paid or unpaid in any commercial work of real or legal entities without obtaining written approval.

Employees may receive offers to participate in out-of-company events as either paid or unpaid speakers or consultants, with their experience gained throughout their business life. Such opportunities should be evaluated by the senior manager of the relevant business unit and by the Director of Corporate Communications to determine whether there is any conflict between personal and corporate interests.

Article 6.4: Business Communication and Records

All kinds of written or verbal communication should be done in a professional manner and in accordance with our codes of conduct. What we say, write and do should clearly reflect the ethical values and expectations of Aydem and indicate the existence of a healthy personal judgment. Exaggeration, misleading, grandiloquent language, too short expressions, legal speculation, condescending words and attitudes towards people, companies and their products and services should always be avoided.

Everything that employees say, write and do should be aimed at protecting and reflecting the honesty and respectability of Aydem. This policy applies to all types of communication, including voicemails, emails, official notes and reports.

Article 6.5: E-mail

Email is an important internal and external communication method. E-mails are records that can be disclosed only if required by legal processes, otherwise must be kept strictly confidential. Any e-mail that does not comply with our ethical standards should not be written or sent by any means whatsoever.

All e-mails should be created considering that they can be considered as legal records and should be written in a professional manner. The transmission of any message should be in accordance with all the policies and must be protected against unauthorized access.

The basic rules to be used while arranging an e-mail are as follows:

- i. E-mail shall be used when the job requires it.
- ii. While preparing the e-mail, it should be taken into consideration that it is a document that can be observed as a written record; therefore, respectful, clear, honest and precise statements should be used. Exaggerated, frivolous language or slang expressions or humiliating words should not be used in the content of the e-mail.
- iii. Reply messages should contain sufficient information to avoid misunderstanding. Communication by e-mail should be consistent with our ethical standards and policies as well as the nature and purpose of the ethical standards, and each message should be carefully reviewed before it is sent.
- iv. Our standards on information protection and security also apply to e-mail communication. This is because e-mail messages are sent outside the company over the public networks such as the Internet, and may be stopped or misdirected in the meantime. Therefore, great care must be taken to ensure that it does not contain any information that could be used to harm the Company, its customers, employees or any of its shareholders.
- v. If confidential information needs to be transmitted via the internet, it must be sent using secure (encrypted) e-mail facility. Business-related "Top Secret Information" should not be sent out of the Company by e-mail.
- vi. To reduce the risk of disclosing customer information, if a customer sends an e-mail containing personal information, this information should be deleted from the e-mail reply section.

Email facilities should not be used for the below:

- i. To forward or store messages that may be perceived as offensive, insulting or hostile,
- ii. To forward or store virus alerts or prank messages (Information Security Management should be informed about these warnings),
- iii. To engage in communication or activity that could harm Aydem or any of its customers or shareholders,
- iv. To forward chain messages to others containing expressions of protest, aid or exploiting human feelings (those who send such messages should be warned and the Ethics Committee Representative should be informed that there is such a chain message in the system),
- v. To forward messages that will adversely affect the system capacity, including attached files containing non-business, entertainment games, audio and video,

vi. To chat through messaging programs during working hours; e-mail and messaging becoming negligence of work.

Article 6.6: Monitoring E-mail and Other System Usage of the Employee

Aydem reserves the right to monitor whether the e-mail, computer files or systems allocated to its employees are used for their intended purposes.

The Company has the right to audit, intervene and read all communications made via e-mail when deemed necessary. All kinds of documents, contract theft, unauthorized photographing, questions asked to employees for information leakage are considered as security violations. The employee accepts this practice in advance. In case the data/information security breach has been committed by the Company employee; disciplinary provisions shall be applied to the person concerned and to the responsible person who neglected the incident. If it is executed by a person or institution outside the Company, legal proceedings shall be pursued, when deemed necessary.

Within the scope of ethical reviews and disciplinary investigations carried out; If deemed necessary, the only unit authorized to examine the devices and software records (notebook, external data storage device, mobile phone, tablet, e-mail, Skype, SMS, etc.) provided to the relevant personnel for the Company's use shall be the Internal Audit Unit. The relevant records may be subject to examination by the Internal Audit Unit upon written request from the Information Technologies Directorate. This authority cannot be transferred to another unit and data cannot be shared with third parties inside/outside the company.

Article 7: Respect in the Workplace and Business Life

Article 7.1: Being Respectful and Considerate in Our Relationships with Others

As Aydem, our main goal is to approach our employees with respect, thoughtfulness and understanding and to create an environment that will contribute to ensuring full communication at all levels. We encourage open discussion of work-related issues and find solutions to these problems.

Developing team spirit within the company, protecting corporate identity and improving it should be adopted as a common goal. All our employees are obliged to create and maintain an atmosphere in the workplace that complies with all values set forth in this guide.

Aydem provides employment opportunities for people varying in terms of race, religion, nation, gender, sexual preference, marital status, age, seniority, family, etc. Our employees are required to value these diversities and maintain their relations with each other in line with the principles of mutual respect, justice, courtesy, honesty and equality.

Company personnel should not disturb each other in the common areas reserved for employees (including the use of service vehicles). In these areas, except those allowed by the management, posters, handwriting and notes should not be posted and selling of goods and services should not be carried out.

It is also unacceptable for an employee to harass another employee directly or indirectly by telephone, e-mail, etc. Harassment includes, but is not limited to, the below-mentioned behaviors:

- i. Defining members of a particular group with derogatory statements,
- ii. Negative classifications, humiliating jokes, offensive expressions,
- iii. Sneering pictures or cartoons that humiliate a particular group or person,
- iv. Any humiliating words or physical attacks that affect the relationship between employees by creating a restless and hostile work environment,

- v. Exhibiting physical or verbal behaviors contrary to the discreet relationship required by the working environment, to forge a link between the sexual preference of the employee and promotion at work, performance assessment, co-operation with colleagues, etc. or to threaten them,
- vi. Any kind of undesirable sexual approaches, sexually explicit offers or other statements or similar gestures.

No offensive and/or vengeful behavior shall be exhibited against employees who report harassment or inappropriate behaviors exhibited in the work environment to the relevant management and/or to the Ethics Committee Representative. Furthermore, our managers are required to manage such situations confidentially.

Ethical Committee Representative and Human Resources Management should be informed in case any kind of aforementioned harassment or offensive, incriminating attitude and behavior that causes a problem leading workforce decrease and performance decrease in the corporation or if any of our employees think that they have been subjected to similar behavior by their friend that they work with, by a manager or by a customer.

Article 7.2: Our Principles on Harassment and Mobbing

Any breach of privacy, through physical, sexual and/or emotional harassment to our employees or by our employees to our stakeholders with whom we have a business relationship, at the workplace or in any place where they are on business, shall not be tolerated. Possible negative attitudes and behaviors towards those who report such violations or assist during the investigation shall be considered as a violation of our codes of conduct.

Systematic and planned behaviors that aim to disincite the targeted persons from work, reduce their performance, and cause them to resign in a manner to be evaluated within the scope of psychological harassment (mobbing), shall not be tolerated.

Article 7.3: Attitude / Behavior and Appearance

Aydem employees should wear a clean, attentive, professional style of clothing in their working environment and be friendly, caring and respectful to everyone.

Employees should represent Aydem, which is a corporation of trust, in the best way possible with their behaviors and appearances. This principle is extremely important in terms of improving customer relations and increasing the reputation of the corporation and it must be meticulously fulfilled.

Creating team spirit within the company, protecting and improving the company image is the common goal that plays an important role in the workplace and in the personal life of each employee. In order to prevent negative reflections on the business and/or the image of the company, a professional and financially balanced and harmonious attitude should be displayed.

In external relations, equal respect must be shown to the customers, potential customers, shareholders and to the communities we provide service. This requires courteous service, ethical business conduct, and compliance with all laws and regulations. As the employees of Aydem, a customer-oriented company, we have a responsibility to act in a manner that creates positive impressions about Aydem.

Employees must comply with the standards of accuracy in high levels in performance of their daily work, and strive to do their best in order to ensure that company goals and objectives are achieved. During the working period, the employees should use the time correctly and make sure that their private works are kept short in a manner so as not to interfere with customer transactions.

Article 7.4: Ensuring Internal Hierarchy in the Company

The development of the employees has a great contribution to achieving the goals of Aydem. Managers should manage employees based on professional criteria and recognize the opportunity to develop and reward all employees equally, in relation to their contribution to the success of the Company. Managers, who coordinate specific tasks or departments, should exercise the competencies designed for their works in a balanced, impartial manner, and taking into account and respecting the personal dignity of the staff. Our managers should refrain from doing a job and/or having someone do a job outside of their authority by exploiting their positions and responsibilities for any purpose. Our managers must constantly support the professional development of employees.

Within the framework of honest and discreet management principles, managers shall be responsible for proposing and realizing management styles that will increase the values of the Company, for providing maximum profit to the Company and for protecting the rights of the employees in the long term.

Employees should work in a manner that ensures maximum cooperation with their managers by avoiding behaviors that do not comply with the business principles.

Our employees are responsible for following the instructions of their superiors as a general principle. However, our employees are not obliged to follow the instructions that may damage the profitability, productivity and reputation of Aydem or that do not comply with the Company's principles and legislation provisions related to the subject matter. The employees who are of the opinion that the instructions are contrary to legal and/or internal regulations or harmful to the Company, shall submit this opinion to the superior manager and the Ethics Committee Representative. The employee who fulfills the instruction should immediately notify the Internal Audit Unit without delay regarding the case, if he believes that the action he has made in accordance with the instruction constitutes an offense clearly stated in the relevant laws and regulations and/or will cause damage to the Company. Relationships between different levels of task should be regulated within the rules of mutual loyalty and respect created by the hierarchy - within the Company and with respect to the Company values and objectives.

Article 7.5: Working of Those With Kinship Relation

Our colleagues with the following degree of kinship relation cannot be assigned to report directly to the same manager in any department of the company.

- i. Spouse, mother, father and children, siblings, uncles, aunts and their spouses and children,
- ii. Your spouse, mother, father, sibling, uncle, aunt and their spouses and children.

All transactions involving family members and relatives of employees shall be performed by other employees who are not involved in the said transactions.

At the same time, in order to ensure maximum transparency in all works, our employees should inform the Human Resources Management in the event that one of their family members (if blood relationship is in question) has a connection or makes contact with the Company.

Article 7.6: Compulsory Attendance

Our employees are obliged to pay attention to comply with the working hours determined for the workplace and to use the personnel attendance control system (card scan, fingerprint scan, etc.) at the entrances and exits. It is essential that the employee is in place during the working hours.

An employee who leaves his/her place of duty for any reason must inform his/her manager or his/her closest colleague to convey to the person to whom he/she is attached.

The employee, who should be out of the corporation due to his duty, should inform his/her manager about the place his/her destination and the hours he/she will spend outside.

Article 7.7: Information Sharing with Colleagues – Take-over Obligation

Employees who leave their duties permanently or temporarily cannot leave their duty unless they hand over the money and money-equivalent values, documents, tools and equipment that they have to keep and use. This principle also applies to those who are temporarily appointed to other positions. If the company suffers any loss due to non-performance of the take-over duties, those who cause such shall be held responsible.

Article 7.8: Equality in Opportunity / Providing Equal Opportunities in Employment

Aydem aims to create a working environment that values the talents and experiences of each individual, respects differences and recognizes the ideas and opinions of each employee.

Respecting difference is not only the right way to do our job but also essential for the success of our business.

Aydem does not allow discrimination among its employees. It ensures that all personnel practices are carried out based on individual abilities and merits, regardless of race, religion, color, age, gender, national origin or lineage, sexual preference, physical disability, seniority or other factors determined and protected by law. These practices include, but are not limited to, recruitment, selection, performance management, training, placement, transfer, promotion, disciplinary action and termination of labor contract.

Article 8: Workplace Safety and Health

Article 8.1: Occupational Health and Safety (OHS) and Environmental Protection

The company is obliged to provide all the employees with the maximum OHS conditions, to provide training and to deliver their equipment. Likewise, employees are obliged to participate fully in related trainings and to take all the necessary precautions regarding the subject matter. All employees must notify their manager of any possible dangers they see in their workplaces either in writing/verbally and/or by filling out "Near Miss" forms. To share the lessons to be learned about the occupational accidents in the field shall be under the responsibility of the process owners concerning the OHS and human resources management. Employees are obliged to comply with Aydem Occupational Health and Safety and Environmental Policies and the details specified in the relevant legislation.

OHS incidents shall be reported to the relevant authorities in a transparent and proper manner in accordance with the legislation and Company policies/principles.

Article 8.2: Keeping and Bearing Arms

It is forbidden for employees, customers and visitors to carry weapons in their workplaces, except for those who are in a position to carry weapons due to their duties (Security Officers, etc.).

During the control checks at the building entrances, our colleagues are required to go through the checks, regardless of their titles.

Carrying weapons for special reasons and armed entry of visitors are only possible with the permission of the Human Resources Management.

Article 8.3: Substance (drug) Use

The use of any substance (alcohol, drugs, etc.), that may affect the work performance of our employees or endanger the workplace safety, is strictly prohibited. This prohibition also includes being affected by these substances which may adversely affect the work performance of the employee when entering the Aydem buildings.

Article 8.4: Betting and Gambling

Employees may not be engage in activities such as betting and gambling that could damage the public reputation of Aydem company.

It is prohibited for all employees to organize or participate in any gambling activity, such as procurement of gambling tools, organizing any type of goods or money prize draws or games, buying or selling tickets for such games.

Article 9: Scope and Codes of Practice

Aydem Codes of Conduct and Business Principles have been published by the Board of Directors and are reviewed once a year in line with the needs, changing conditions and current practices.

Article 9.1: Violation of the Codes of Conduct and Business Principles and Its Results

Our Codes of Conduct and Business Principles are among the main key factors of our reputation and our continuous success in the sector. Violation of these rules and principles may adversely affect our reputation and success in the industry. Therefore, acting in an unethical manner contrary to our honesty principle or going beyond the working principles are within the scope of ethical review or disciplinary investigation. All our employees are obliged to act in accordance with these rules.

Our employees are obliged to carry out their responsibilities in accordance with the current, applicable written laws, regulations and legislation and general tendencies. Our employees may not engage in any illegal activity or inform anyone in this manner while performing their responsibilities in the Company or carrying out their daily work.

Any violation of laws, corporate principles or codes of conduct, such as not cooperating in an investigation, may be subject to ethical review or disciplinary investigation.

Article 9.2: Duties and Responsibilities of the Ethics Committee Representative

Ethics Committee Representative shall be responsible for;

- i. Guiding and advising on questions and issues raised by employees on ethics within the company,
- ii. Directing ethical nonconformities, that cannot be resolved within the Company or require ethical review or disciplinary investigation, to the Ethics Committee,
- iii. Contributing to the resolution of the ethical nonconformities within the Company in line with the request of the Ethics Committee,
- iv. Reporting the ethical questions and nonconformities to the Ethics Committee regularly or upon request together, with the results,
- v. Being the contact person of the Company in ethical reviews and investigations requested by the Ethics Committee and providing the necessary support to the reviews and investigations carried out by the Internal Audit Unit,
- vi. Monitoring and tracking the effectiveness of ethical practices carried out in the company and supporting the practices.

Article 9.3: Duties and Responsibilities of Managers

Aydem managers have additional responsibilities beyond the responsibilities defined for employees within the framework of Codes of Conduct and Business Principles. Accordingly, the managers are responsible for;

- I. Ensuring the establishment and maintenance of a corporate culture and working environment that supports codes of conduct,
- ii. Setting an example for the implementation of codes of conduct with their behaviors and educating their employees on codes of conduct,
- iii. Supporting their employees in submitting questions, complaints and notifications about codes of conduct,
- iv. Providing guidance on the actions to be taken when consulted, taking into account all notifications and forwarding them to the Ethics Committee as soon as possible when necessary,
- v. Structuring the business processes under their responsibility in a manner that minimizes the risks related to the ethical issues and applying the necessary methods and approaches to ensure compliance with the codes of conduct.

Article 10: Resolution of Incompatibilities

Article 10.1: Ethics Committee Organization

Incompatibilities on ethical issues are resolved within the Aydem Ethics Committee.

The Ethics Committee structure has been specified under the Ethics Committee and Disciplinary Committee Structure and Working Order Procedure.

Article 10.2: Notification of Violations and Ethics Committee Business Principles

The Ethics Committee conducts its activities within the framework of the following principles:

- I. Notifications and complaints and the identity of those making the notification or complaint shall be kept as confidential and a policy to prevent possible retaliatory attitudes and behaviors against employees or individuals who report ethical violations shall be adopted;
- ii. Reviews and investigations shall be conducted in confidentiality;
- iii. Authority to request information, documents and evidence related to the review and investigation directly from the existing unit shall be possessed;
- iv. All kinds of information and documents obtained shall be examined only limited to the subject of investigation;
- v. The review and investigation process shall be linked to a written report from the beginning and the information, evidence and documents shall be attached to the report;
- vi. The notifications subject to the review and investigation shall be handled urgently and the result shall be reached as quickly as possible;
- vii. The decisions taken by the Board shall be implementing immediately;
- viii. The relevant departments and authorities shall be informed about the result;
- ix. The chairman and members of the Board shall act independently and without being affected by the department managers and by the hierarchy within the organization, while performing their duties on this subject. No pressure or suggestion can be made to them on the subject.
- x. The Board may seek expert opinion if it deems necessary and may benefit from experts by taking measures that will not violate the confidentiality principles during the review or investigation.



