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PREFACE

Every company has policies, dreams, foresights, objectives and business philosophy that it plans to carry to the future since the first day it was founded, and these develop over time in line with the development of the company and its experiences, and it exhibits a tendency to expand and transform in terms of scope as well. There are also some standing values of companies, perhaps it would be more correct to call them root values. In time, it can be clearly seen that the company has been built on these values, and the path of the company has been illuminated thanks to these values.

These are the values that keep the company firmly standing and together in difficult times, and looking back on the good days, these are the values that carried the company back to those days.

Every person has an effort to distinguish between right-wrong, good-bad, just or unjust and similar concepts that exist both in themselves and in the society they are in, and has a tendency to act in this direction by choosing the right, the good and the just one among them. We briefly call these values ethical values. The same logic applies to businesses. Although these values are often known by everyone, getting them on a paper will ensure that all stakeholders act on the same line in expanding and growing organizations.

We, as Birinci Otomotiv, create a policy that describes our ethical values, and thus, we present our ethical values and ethical principles that our company has tried to protect, develop, adopt and have adopted since the day it has been founded, to the attention of all our stakeholders with this document.

1. Purpose

This procedure includes the principles that the employees of Birinci Otomotiv AŞ (hereinafter referred to as the “company”) must comply with while fulfilling their duties. The aim is to ensure that the behavior of employees is in line with company procedures, to outline the basic rules to be followed, and is to prevent all kinds of disputes and conflicts of interest that may arise between employees, business partners, customers, suppliers and the company.

2. Scope

This procedure covers relations with senior management, managers, employees, consultants, customers, suppliers, other persons or institutions conducting a business with the company within the framework of all activities performed in the company.

The company managers and all employees are responsible for the implementation of these principles.

3. Definitions

Ethics: The set of behaviors that the parties must comply with or avoid among various professions, moral, related to morality.

Ethics Committee: It refers to the ethics commission that detects the violations of ethical principles and behaviors within the company, and receives, examines and evaluates regarding this. The committee members are determined by the company management with the approval of the board of directors.

Conflict of Interest: A situation that indicates the potential of a person or company to obtain personal or corporate benefits by improperly using their status.

Company Culture: The values, beliefs, traditions and ethical codes that are mandatory for all employees of the company and determine their behavior.

Company Resources: It includes tangible and intangible resources such as the people within the company and employing due to its activities, the machines, materials and vehicles it uses, intellectual property, reputation, information and information resources, documents, communication tools and communication channels, software and cash.

4. Implementation

4.1. Complying With The Law

We, as Birinci Otomotiv, consider our responsibilities towards all legal companies and organizations of the state, administrative authorities and non-governmental organizations while performing all our activities and businesses. We unconditionally comply and implement our obligations within the framework of laws and codes, in the agreements we conclude with our employees and stakeholders, in the business relationships we establish.

- We act in accordance with the laws and regulations applicable in every field in which we operate, at home and abroad.
- We are extremely respectful to the local values of our international stakeholders. We work to understand their values and to explain ourselves and our company culture.

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- As a global company operating in many countries and cultures, we respect the rights of others in all our relationships and we follow our rights.
- We adhere to the laws of the Republic of Türkiye and the basic principles of the Constitution. We show that we have adopted these principles in all our activities.
- We believe in the rule of law, act in accordance with the law, we rely on fighting against all kinds of corruption and we never compromise on this characteristic.
- We do not profit loopholes or inadequacies in laws or regulations in a way that goes against the norms of the company.
- We act in accordance with the principles of legality, justice, equality and honesty in all our actions and transactions.
- It is essential that all financial records of the company are accurate, kept on time and arranged in accordance with the law. These records are based on the fulfillment of the company's responsibilities towards its stakeholders, employees, customers, suppliers and official institutions.
- Provided that an intentional violation of keeping records accurately and properly is noticed, the situation should be reported to the ethics committee immediately.
- An employee who does not report such a violation despite noticing it is deemed to have violated the ethical principle and is sent to the ethics committee.

4.1.1. Protection of Personal Data

Birinci Otomotiv AŞ complies with the Law on Protection of Personal Data No. 6698 ("KVKK") and its sub-regulations, published in the Official Gazette No. 29677 dated April 7, 2016, constitutes and updates all necessary infrastructure for compliance with these regulations.

The Company processes, stores and transfers only the personal data considered necessary to provide the best service and product it aims to provide, along with the mandatory information must be obtain from its customers, suppliers, employees and other 3rd parties, to the extent permitted by legal regulations.

In this regard, the personal data is processed for the purpose of presenting our company's products and services, performing necessary works, contacting the data owner regarding our products and services in the event of an explicit consent, conducting marketing activities. Furthermore, the personal data is processed for the purpose of performing customer acquisition studies and sharing offers regarding our products and services, making reports and examinations deemed necessary within the scope of company activities.

4.2. Accuracy, Honesty and Justice

We act fairly by considering accuracy and honesty in our relations with our employees, customers and suppliers, while performing all our company activities. Accordingly, it has a great importance for our company to expect to act by considering accuracy and honesty. Our primary objective is to be in line with facts and not to deviate from the right path, no matter how unfavorable the conditions we encounter. Therefore, we stand behind our promises and expect the same sensitivity from our employees. Ethical considerations that we will never compromise on are all kinds of slander, lies and defamation, concealment or deception of the truths, misinformation on the products produced, failure to fulfill the promises and commitments (both our employees, our customers and our suppliers), theft of ideas, receiving, giving, promising or attempting to receive a bribe in any form whatsoever, all kinds of intimidation, insults, discrimination, verbal and physical harassment against our company employees.

We expect all kinds of immoral relationships that may create a conflict of interest both within and out of the company to be avoided. We ask our employees, who are aware of and receive information about a possible conflict of interest, to immediately inform their supervisor, the Human Resources Department or the Ethics Committee directly.

Provided that there is any kinship or close friendship relationship between our employees or with our customers and suppliers, we expect the matter to be unequivocally declared to our ethics committee by our employees.

We certainly do not approve that our employees and/or their relatives who do not work in the workplace engage in any commercial activity other than our company's business with the organizations we cooperate with (all kinds of companies from which we receive products and services), and such a relationship is completely against our ethical codes.

4.3. Transparency, Accountability and Responsibility

Announcing the financial and non-financial information regarding the company to easily accessible to the public in a timely, accurate, complete, clear, understandable, interpretable and comparable way, except for information that has the characteristics of a business secret and has not yet been disclosed to the public,

Establishing accountable processes both within and out of the company,

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Performing all transactions and activities accomplished on behalf of the company in accordance with the legislation, articles of association and in-house regulations, and subjecting to continuous internal and external audits are essential.

4.4. Our Responsibilities to Our Stakeholders

We show attention to protect our company's reputation by standing behind the promises and guarantees we offer in our relations with all kinds of commercial establishments, as corporate reputation ensures that the relations with both customers and suppliers are performed in a qualified manner, that the reputation of the market is increased, and that the commercial relations conducted are longer-term and permanent. We fulfill our tax and similar corporate obligations before the government in accordance with the law and on time.

It is our primary objective to make production at the high quality standards required by our industry and at once in the products we produce and the services we provide. In this regard, we act in accordance with quality and standards, and fully comply with all instructions and procedures brought by the standards. Furthermore, we conclude internal audits in order to ensure the continuity of in-house production and quality discipline with the teams we have established among ourselves, and in accordance with the certificates of the quality granted by independent organizations, we are audited by these organizations at certain periods. In addition to bearing the responsibilities of working with Automotive Main Industry organizations, we consider and adopt the in-house audits when deemed necessary by our customers as a support to realize higher quality production.

While carrying out studies to produce higher quality products, on the other hand, we try to produce better products at a lower cost by making continuous improvement studies in Production Processes. We continue to invest in the necessary machinery and equipment constantly in order to have more detailed product, more precise measurement capability. In accordance with the certain objectives and strategies, it is one of our basic principles to work on producing our own specific product(s), by making infrastructure studies related to product development and new product design.

4.4.1. Our Responsibilities to Our Shareholders

- We protect the rights and interests of our shareholders, employees and, in short, all of our stakeholders, even when there is no legal obligation.
- We make our decisions in accordance with the objective of creating value for our shareholders and in the light of economic criteria, giving priority to sustainability.
- We place importance to the most efficient management of resources.
- We assure that matters that need to be disclosed to our shareholders and the public are announced fully, timely and accurately with an understanding of accountability.
- We benefit from the criticisms and recommendations of our shareholders and maintain good relations.

4.4.2. Our Responsibilities to Our Customers

We regard to be a customer-oriented company as well as quality, deliver the products on time, under the requested conditions and in complete, serve our customers in accordance with the principles of respect, courtesy and equality by knowing our legal rights, and expect our employees to have the same attitude.

- Our customers, who are our solution partners, are priority and valuable. We aim to win together with them, mutual trust and satisfaction, and consider their opinions and recommendations.
- We are fair, honest and stable in our business relations. We are fully committed to our written and verbal commitments.
- We carefully protect the confidential information of our customers.
- We provide all standards of service and product to all our customers with complete consistency.
- We always provide a completely safe and hygienic environment for all customers.
- We concentrate our time, energy and resources on the development of our own product and services.

4.4.3. Our Responsibilities to Our Suppliers

We consider all our suppliers as our business partners and behave as expected from a good customer, pay attention to fulfill our responsibilities and obligations on time, engage in studies that will increase the quality and production awareness of the companies we do business with, and take place in the necessary training and exchange of ideas. We conduct audits in order to measure, evaluate and contribute to their development.

- We respect and protect the rights of our suppliers under laws and regulations.

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- In cases where it is not regulated by legislation, in accordance with the good faith rules and the possibilities of our companies, we protect the rights of our suppliers by taking into account the reputation of our company.

4.4.4. Our Responsibilities to Our Competitors

We remain loyal to the principles of our working principles, while conducting our relations with all our competitors. We do not allow our activities to lead to unfair competition. We do not tolerate those who engage in such activities.

4.4.5 Our Responsibilities to Our Employees

We do not avoid the necessary training and investments for our employees' personal and technical development, considering that they represent us in the workplace and in the companies they go to. We create a comfortable and peaceful work environment for our employees, and ensure that they fully benefit from the employee personal rights. We encourage and guide our employees in order to be open to continuous development and learning.

4.4.6. Our Responsibilities to the Environment and the World

We, as Birinci Otomotiv, have an understanding of an environmentally conscious company that is sensitive to the environment in which it lives, and expect our employees to show the same sensitivity and awareness. We support environmental protection and ecological life, we try to comply with the laws and regulations established in this regard. As our corporate culture, we show ultimate attention to assimilate and sustain the necessary efforts to protect natural resources, to keep the air and water clean which are the two most important resources for life, to manage the wastes that arise during production, to ensure the recycling of recyclables and to reduce wastes as much as possible.

Beyond fulfilling our legal responsibilities for the protection and improvement of nature and the environment, we are the people who work voluntarily to increase the love of nature and environmental awareness, and we spread this feature to other segments of the society. Birinci Otomotiv employees in all corporate areas also take measures to protect the environment, notify their supervisors and/or senior management of any violations and ensure that necessary measures are taken.

We believe that creating employment and contributing to the economy does not give the right to pollute the environment, and we assure that all activities to protect the environment are constantly improved. We pay attention to the development and use of eco-friendly technologies and encourage behaviors towards this. Thanks to the awareness that the resources of our country and the world are limited, we focus on reducing waste and energy consumption, and try to prevent all kinds of waste.

4.4.7. Our Responsibilities to Society and Humanity

As a company operating on a global scale, we aim to contribute to the economic development and growth of the country, to promote our country and society values positively in our international relations, and to respect the life and principles of different geographies and different cultures.

Our primary objective in this regard is to raise awareness and lead the society in order to contribute to the quality of life.

We execute our work institutionally on education, culture and social assistance. We believe that education is very important for humanity, and we work especially to increase the education level of our country's young population.

The company acts sensitively to the traditions and cultures of the countries in which it operates.

4.5. Conflict of Interest and Misconduct

A conflict of interest is a situation that indicates the potential of a person or company to obtain personal or corporate benefits by improperly using their status.

We expect our employees to prioritize the company's interests. Our employees shall not use their titles, positions and company information to gain income for themselves or their relatives.

Employees must avoid situations that may create a conflict of interest in their work-related activities. In cases where a possible conflict of interest may arise between company interests and personal interests, they act carefully, take the necessary steps to avoid a conflict of interest, and notify their manager and the ethics committee simultaneously when they realize this situation regarding themselves or other employees.

Employees must directly or indirectly receive a personal gain from all transactions and contracts to which they are a party, through company activities.

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4.5.1 Executing Transactions in Favor of Oneself and Their Relatives

It is essential that all employees who have a kindredness in the company are not in a reporting relationship with each other in the same organization or that they do not take part in decision-making mechanisms together. Although exceptional cases are subject to the approval of the board of directors, necessary controls must be established.

Managers and human resources recruiters, who are in the position of making decisions in the recruitment processes, must take measures to eliminate the conflict of interest in case they have a relationship with a candidate who has applied for a job, including spouse and third degree relatives. Managers who are in a position to make a hiring decision shall not hire their spouses, close relatives and relatives of these people. This may be achieved by involving alternative human resources officers who do not have a conflict of interest situation. The most important criterion in recruitment and employment is to seek the qualification of suitability for work and to provide equality of opportunity without any discrimination.

Employees must not have financial interests of themselves, spouses and third-degree relatives in any organization that has a competitor, supplier or customer relationship with the company or is trying to do business. It is essential that company employees do not have partnerships, board memberships, consultancy or employee relations with these organizations. In case of any commercial relationship with 3rd parties, the said commercial relationship becomes valid with the approval of the board of directors.

It is essential that the employees of the company do not work directly or indirectly that require them to be considered 'tradesman' or 'craftsman', and that they do not work for another person and/or company in return for a wage or similar benefit, during or outside working hours, under any name whatsoever.

The personnel working as arbitrator, mediation, expert witness given by judicial or administrative authorities are excluded from this restriction.

4.5.2. Accepting and Giving Gifts

Company employees shall not ask for gifts, gains, aid, entertainment, special discounts and commissions that may affect their impartiality, decisions and behaviors for their own benefit, and should not accept offers in this regard. Providing personal benefit by using the company name is grounds for termination of employment. Company employees shall not directly benefit from free delivery or all kinds of gifts, entertainment and similar items made on behalf of the company or the members of the board of directors. On the other hand, our employees shall not accept gifts and/or cash money from any company or organization, except for gifts whose material value does not exceed **10% of the minimum wage**, which is very symbolic and can be easily obtained by everyone. We expect the people and institutions involved in such attempts to be rejected by our employees, and then to inform the department heads, managers or the Ethics Committee directly of such actions and attempts. **Any gift that comes to the unit managers or the board of directors within the company shall be given to the finance director within the minutes to be given to the employees by drawing and shall be kept in the finance safe.**

Our employees shall not accept gifts of cash or cash equivalents, or borrow money from suppliers, consultants, competitors or customers, regardless of their amount.

Our employees may organize entertainment and dining activities and participate in similar activities in internal and external activities that will not damage the image of the company.

Gifts other than awards, plaques, and certificates etc., which have symbolic value as a memory of the day, shall not be accepted in seminars and similar organizations attended on behalf of the company.

Our employees are expected to pay attention to situations that may create a potential conflict of interest in terms of affecting the decision-making processes in activities (entertainment, free training, seminars, accommodation, trips, meals, etc.) sponsored by 3rd parties or institutions. Employees and managers shall not accept any cooperation that will provide commercial and/or moral benefits to the organizations visited or cooperated in such activities. The Company is aware that the rejection of such offers in certain circumstances may adversely affect supplier, customer etc. relations. Therefore, free conferences, promotional meetings, educational etc. participation offers, organizations open to general participation, sports and similar activities from our suppliers or customers shall only be accepted with the written approval of a senior manager.

Our employees shall not give gifts to companies and persons with whom they have a business relationship, except for the gifts that the company has prepared for 3rd parties for promotional purposes. All kinds of gifts to be given to 3rd parties must be approved by the company's general directorate or the board of directors. Provided that it is not approved, The compensation for the gifts given is obtained from the person concerned and the subject is referred to the disciplinary committee.

Giving, receiving or offering bribes and commissions against the company is unacceptable under any circumstances. While we carefully avoid unethical behaviors such as bribery, corruption or giving and accepting gifts and similar products and services at an excessive price, abuse of office, we support efforts to eliminate such crimes.

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4.6. Political Activities

We respect and do not limit the voluntary participation of our employees in legal political activities. Company employees are also obliged to observe the following conditions in their individual and voluntary political activities;

- Employees must stay away from situations that may create a conflict of interest in their current duties and responsibilities due to the political activities they are involved in.
- Company name, title within the company and company resources shall not be used in individual political activities.
- Political propaganda shall not be made during working hours and in the workplace environment, and the time of other employees shall not be taken for these activities.
- Company employees shall not share their political views on the social media and mass media of the company and in the channels mentioned by the company.
- Employees shall not make false posts on their own social media accounts and other relevant media in a way that will damage the company name and image.

4.7. Doing Business with the Company by the Resigned

In order for the resigned ones to be able to do business with the company as a seller, contractor, consultancy, or similar, in the institution before;

There should be no disciplinary record about them,

There should be no conflict of interest due to the duties they have undertaken.

In order for the resigned ones to be able to do business with the company, the above conditions must be met and the approval of the board of directors is required.

4.8. Protection of Business Secrets and Confidentiality

Confidentiality for us includes all kinds of information about the customers and suppliers we work with, but also includes the information about our company that will create a disadvantage in market competitive conditions, strategic decisions, plans and projects taken by the company for the future, new products developed and planned to be developed, R&D studies and drafts, planned activities related to marketing and sales, launches, business secrets, personal information of our employees, confidentiality agreements signed with customers, suppliers or third parties.

We act with the awareness that leaking all kinds of information about us and our customers from inside the company to outside is an ethical violation, no matter what purpose it serves. We do not share the information of any of our customers and suppliers with third parties, and we do not use them for our purposes and interests. We do not share the our employee's personal information with any company or institution, unless required by law.

In addition, we show sensitivity to the privacy rights regarding computer, e-communication and internet use, due to our respect for the private life and personalities of our employees, and we act in accordance with the legal obligations.

We expect our employees whose employment contract has completed, not to take the confidential information, documents and projects they are involved in due to their duties, all kinds of work they do individually or as a group, and their results out of the company, and to submit them to the relevant department supervisors, and to act in accordance with the ethical codes when leaving the company. We declare that legal procedures will be put into effect immediately when a situation to the contrary is detected.

Confidential information is not limited to; In addition to the intellectual property rights of the company and all kinds of innovations; also includes the database that the personnel wrote, found, developed or implemented, printed communication materials, business processes, advertising, product packaging and labels, and business plans (marketing, product, technical), business strategies, strategic partnerships and information on partners, financial information, the employee's personal information, salary, premium, bonus and all kinds of wages and benefits similar to wages based on the employment relationship, supplier, customer lists, price, product designs, method information (know-how), specifications, identification information of potential and actual suppliers and customers, any written, graphic or machine-readable and similar information.

4.8.1. Privacy Practice Principles

The principles that the employees of the company must be sensitive to and comply with regarding confidential information are as follows;

- Confidential information, judicial decisions and legislation shall not be disclosed to third parties unless their disclosure is required. Employees shall not exceed their authorities and make a binding statement to the company, and shall not make deceptive and untrue statements, while performing their duties. Provided that the subject is beyond the authority and knowledge of the company employee, it is directed to the relevant unit or personnel. Persons who will make statements on behalf of the company are determined by the management.

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- Confidential information shall not be altered, copied or devastated. Necessary measures are taken to ensure that information is carefully kept, stored and not disclosed. Amendments on the information are recorded together with its history.
- Confidential information shall not be spoken in dining halls, cafeterias, elevators, service cars and similar public places.
- Confidential documents and information shall not be taken out of the company. In the event that there is a necessity for confidential information to be taken out of the company, the person responsible for the information shall obtain approval from the senior management and/or the board of directors.
- Passwords, user codes, authorizations and similar identifying information used to access company information systems shall be kept confidential and shall not be disclosed to anyone other than authorized users.
- Provided that the information is shared with third parties and/or organizations for the benefit of the company, first of all, a confidentiality agreement is signed for information sharing or a written confidentiality commitment is received from the other party in order to ensure that the responsibilities of these individuals and organizations regarding the security and protection of shared information are understood. In these implementations, it is essential to get support from the legal department.
- All official statements shall be announced to the suppliers, customers and the public in a complete, simultaneous and understandable manner, in accordance with equality, through the units determined by the company.
- No false statements and/or gossip shall be made about people or organizations working in the company.
- The wages, side benefits and similar personal information of the personnel, which reflect the company policy and are personal, are confidential and shall not be disclosed to anyone other than the authorities. Employee information is sent privately. Employees shall not disclose this information to others or pressure other employees to disclose the information. It is a crime to be dealt with by the ethics committee in the determination of otherwise.
- Provided that it is not even stated in writing that it is confidential, the confidentiality of all kinds of information and documents specified in the definition must be protected, and this responsibility of our employees continues throughout the time they work in the company and even after they leave the job.

4.9. Occupational health and safety

We do not compromise on occupational health and safety. Product cost or production increase is not more important than these issues.

All necessary measures are taken to provide the best possible protection against occupational health and safety risks in the workplaces of the company.

Developing policies to reduce risks, the results obtained are checked against the applicable standards and whether these safety measures are properly implemented.

These policies apply to both company employees and employees of subcontractors who work at company-affiliated sites.

Continuous trainings are given on occupational health and safety, and employees are regularly informed in this regard. It is ensured that the personal safety equipment required by the job is worn, each employee has the responsibility for reporting risky situations.

All issues that are likely to harm the employees or the company regarding occupational health and safety must be reported immediately to the OHS specialist and unit supervisors.

4.10. Our Labor Policy, Respect for People and Employee Rights

We, as Birinci Otomotiv, know that in order to produce high quality products, it is necessary to create a peaceful, disciplined, hygienic environment, comply with laws and regulations, provide conditions for employee health, fair, where employees are respectful to each other, and we make our regulations accordingly.

Our primary objectives are to enable our employees to be productive in the workplace, to develop their personal and work experiences, to create workplace belonging, to see the company as their own workplace and to act accordingly. We focus on development studies related to improving the working environment in cooperation with both personnel employment and relevant institutions related to occupational and worker health, and accordingly, we provide the necessary equipment allocation and transfer of information and training to our employees.

We be attentive to take measures to prevent work accidents and occupational diseases. We show an attention to be a workplace that provides fair and equal opportunities, from recruitment to working time to all our colleagues in our company, regardless of ethnic identity, language, belief, race, gender, nationality and political view. We perform recruitment, promotion, termination of employment, leave, wage and training activities fairly within the frameworks set by the laws.

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We respect all the rights of our employees, we value them. We behave without prejudice and tolerant. We believe in the dignity of every human being. We see both verbal and physical violence and sexual harassment as unacceptable behaviors.

Company employees show the necessary sensitivity not only for themselves but also for the protection of the private information of the company personnel with whom they have a business relationship.

We encourage continuous dialogue with employees, consider every recommendation worthy of evaluation, and support innovative ideas, diversity and creativity; attach importance to learning, continuous improvement, efficiency, quality and teamwork. Moreover, without any limitation, Forced, compulsory or child labor is prohibited, directly or indirectly, or through subcontractors working in a company-owned workplace, although not provided for by applicable law.

We provide equal opportunity and a fair working environment during the recruitment process or while working, and we do not discriminate against employees in any way. We are sensitive about acting honestly, consistently and fairly towards our employees. We work to develop social dialogue within the company. We implement an "Open Door" policy so that our employees can reach their managers. We pay attention to place the competent and right person in the job whose qualifications are determined.

We create positive working environments that support cooperation in our company; ensure that people with different beliefs, thoughts and views work in harmony. We do not allow religious and political propaganda in the workplace environment.

It is ensured that the employees' personal rights are used fully and correctly. We put the necessary effort for the personal development of our employees and observe the balance between business life and private life. We do not discriminate in matters such as job placement, promotion, rotation, training, leave, and wages in our human resources policy and practice. We provide a safe and peaceful working environment for our employees, and we take the necessary care to protect their health.

4.11. Use of Company Assets

We show due diligence in the use of resources and materials in the company, and we prioritize saving in all areas.

Considering the keeping the common areas clean is a must for the common use of the work area. At the same time, it is essential that the company's energy resources such as electricity, water and natural gas are used efficiently, that they are not used more than necessary and that overuse is prevented. Accordingly, it is the responsibility of each employee to make and control the controls.

Office and stationery tools must not be used for personal work or taken out. The principles of maximum savings are followed for use within the company.

Shared means of transportation may only be used in emergency and important situations and for special needs with the permission of the manager.

All employees are obliged to notify their managers and ethics committee simultaneously of persons and behaviors that maliciously cause damage to company assets.

5. Ethics Committee

It is essential that our ethical principles are internalized and implemented by our employees, starting from the recruitment stage until they leave the company. An "Ethics Committee" has been established within our company in order to assist our employees during these practices, to implement the codes and to correct wrong interpretations.

Furthermore, there is a completely independent "Ethics Notification Line" that any of our stakeholders can use (without having to give a name), how a situation that does not comply with our current values, or how a situation that has happened or is likely to happen will be interpreted in terms of our company's values, or if they have any questions or problems on the subject. Moreover, there is a written e-notification address and "Ethics Committee" message boxes placed at various places within the company for our employees. The messages sent are received only to the members of the ethics committee and all information, questions and requests are evaluated and concluded immediately.

Unlike the disciplinary committee, the ethics committee functions to examine the violations specified in this policy. This ethics committee consists of at least one board member, human resources manager and an internal auditor. The member of the board of directors is the natural chairman of the ethics committee.

Although the ethics committee convenes in all cases when there is an ethical violation; It also meets once a year to discuss what needs to be done to establish and develop an ethical culture, to make an overall assessment of ethical notifications and ethical violations, and to review what should be done to prevent them from reoccurring. All meetings are certainly recorded and archived.

Accordingly, it is the duty of the ethics committee to establish and develop an ethical culture, to give advice and guidance regarding the problems experienced by the personnel regarding the ethical behavior principles, and to evaluate the issues that are contrary to the ethical behavior principles.

Provided that employees learn or suspect that the company's ethical principles or the legislation to which they are subject is violated, they are obliged to report this to the ethics committee. The same responsibility is expected from 3rd Parties. The issues that do not concern the ethics committee are filtered out by evaluating whether the notifications received by a competent

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employee/manager in Human Resources are an ethical violation or a matter that concerns the disciplinary committee, and in the event that the subject concerns the disciplinary committee, the company operates the process according to the Disciplinary Regulations. In case the issue is in violation of the ethical principles specified in this policy, the issue is transferred to the ethics committee for evaluation. The ethics committee examines the issue and takes a decision within 30 working days, at the latest, in accordance with this policy, by considering the legal deadlines depending on the labor law regulations. However, in the event that the process includes a suspicion or evidence of fraud specified in the company's Fraud Policy, it forwards the case or the relevant part of the case to the internal audit unit and informs the board of directors. Internal audit reviews the case as outlined in the Fraud Policy.

Employees, customers, suppliers or all other relevant stakeholders, who observe that the ethical behavior principles are violated, apply to the ethics committee through the following ways;

By e-mail; (etik@birinci.com),

By Petition/Letter; to the Ethics Committee of Birinci Otomotiv AŞ, "TAYSAD Organize Sanayi, 2. Cadde, NO:1 41420 Şekerpınar Çayırova Kocaeli / Türkiye"

Via Ethics Notification Line; +90 262 723 3845.

The petition or electronic mail must also include the situation, concrete documents and explanations describing the violation of ethical behavior principles, as well as the name, surname, phone number and signature of the person making the application. Voice recordings of all notifications made over the phone shall be kept in the company infrastructure in accordance with KVKK obligations in order to constitute evidence.

The notices, complaints, petitions and the identity of the complainant sent to the Board shall be kept strictly confidential, except when the subject requires a possible audit examination and is shared with the relevant internal/external auditing authorities. On the other hand, the confidentiality of the investigation is essential and the department conducting the investigation is not obliged to inform the complainant about the course and outcome of the investigation in any case.

It is objectively investigated whether the notification is within the scope of the company's interests and whether it was intentionally made in order to adversely affect the career of the person notified. Necessary legal actions are taken against those who deliberately make false and slanderous reports. Documents sent to the board and all information obtained by the board shall not be disclosed unless deemed necessary. Notifications made to internal and external audit authorities in any way are also shared with the ethics committee.

5.1. Investigation of Complaint, Decision and Sanction

The investigation of the complaint consists of the following stages;

- Each incoming application (petition, e-mail, telephone, verbal, etc.) is recorded by the human resources unit. In case the subject concerns working life and disciplinary regulations, necessary actions are taken according to the Disciplinary Regulations. However, in case the issue contains an ethical violation, the work is reported to the Ethics Committee by the human resources officer in accordance with this regulation.
- Possible violations of any of the ethics committee members are also reported to the human resources to be recorded.
- Retaliation shall never be made regarding the complaints that will damage the honor of the complainant or cause loss of rights.
- From the date of application, the ethics committee makes an evaluation regarding the subject immediately, and if deemed necessary, a research is initiated and it is determined whether there is a violation of ethical principles.
- Provided that the Board decides that there may be a violation of ethical principles, the investigation becomes a confidential investigation; all kinds of information, documents, detailed research and, when deemed necessary, the information of the employees may be consulted. In the process, human resources, legal and audit units will work together or in any case in cooperation.
- As a result of the investigation of all the evidence, the written defense of the employee who is suspected of violating the ethical principles is taken. The process is operated in accordance with the Disciplinary Regulations.
- All cases where the board needs to be investigated due to ethical violations should be concluded immediately, especially in terms of the provisions of the Labor Law, pursuant to the periods specified in the relevant regulations and the operation of the company.

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Provided that the Board decides that there may be a violation of ethical principles, the decision taken in this regard is submitted to the information and approval of the senior management. At the same time, provided that there is a suspicion of cheating, necessary actions are taken in accordance with the Fraud Policy.

Provided that an investigation is to be executed about one of the board members, the board member stays out of the process until the process is terminated, and instead, a manager determined by the head of the ethics committee is involved in the whole process.

As a result of the investigations executed for employees who act against ethical principles, Penal sanctions are applied to the personnel who are found to have violated these principles, within the framework of the Birinci Otomotiv procedures and the regulations of the Labor Law.

Provided that the violation of the ethical codes is not a result of abuse, but due to the work environment, the instructions of the managers and supervisors, or carelessness and lack of knowledge, a verbal or written warning is given to the person concerned according to the consequences.

Employees who violate business ethics or company policies and procedures shall be subject to various disciplinary sanctions, up to the extent that they are required to leave the job, if deemed necessary. Disciplinary sanctions shall also be applied to employees who approve of inappropriate behavior or who have knowledge of this issue and fail to report properly.

Remember that not reporting a situation that we think is ethically wrong will make you at least as responsible as the person who made the wrong.

Within the framework of the principles mentioned above, it is very important for all of us that our colleagues adopt our ethical codes from the day they start working in our company until they leave in order to ensure the common peace of our employees and our company and our development together, and to provide the warm, sheltered and good relations-based environment that we provide at work at our home. In this regard, it is important to contact the ethics committee in cases where you have the slightest indecision or doubt that something wrong has been done, both in order to eliminate your doubts and to prevent any possibility that may arise out of our responsibilities. Any attempt that we avoid to prevent due to suspicions such as being excluded or marginalized will directly or indirectly harm both you our employees and our company. Your confidentiality and protection will be carefully ensured by our ethics committee.

6. Relevant Documents

Disciplinary Regulations
Fraud Policy

These ethical principles are an inseparable part of the contract of each employee working at Birinci Otomotiv AŞ.

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