

TABLE OF CONTENTS

1 Purpose.....	2
2 Scope.....	2
3 Definitions.....	2
4 Implementation.....	3
4.1 Organization.....	3
4.2 Compliance With the Law.....	3
4.2.1 Protection of Personal Data.....	3
4.3 Business Ethics.....	4
4.4 Accuracy, Honesty and Justice.....	4
4.5 Transparency, Accountability and Responsibility.....	4
4.6 Our Responsibilities to Our Stakeholders.....	4
4.6.1 Financial Responsibility.....	5
4.6.2 Our Responsibilities to Our Shareholders.....	5
4.6.3 Our Responsibilities to Our Customers / Customer Orientation.....	5
4.6.3.1 Product.....	6
4.6.4 Our Responsibilities to Our Suppliers / Procurement.....	6
4.6.5 Our Responsibilities to Our Competitors.....	6
4.6.6 Our Responsibilities to Our Employees / Human Rights and Working Conditions.....	6
4.6.6.1 Working Hours, Wages and Benefits.....	8
4.6.6.2 Equality.....	8
4.6.6.3 Child Labour and Forced Labour.....	8
4.6.6.4 Woman Rights.....	8
4.6.6.5 Motivation.....	8
4.6.6.6 Ethical Recruitment and Diversity.....	8
4.6.6.7 Discrimination.....	9
4.6.6.8 Employee Satisfaction.....	9
4.6.6.9 Freedom of Association and Collective Bargaining.....	9
4.6.6.10 Health and Safety.....	9
4.6.6.11 Harassment and Violence.....	9
4.6.6.12 Personal Development.....	9
4.6.7 Our Responsibilities to Environment and the World.....	10
4.6.8 Our Responsibilities to Society and Humanity.....	10
4.7 Conflict of Interest and Misconduct.....	10
4.7.1 Transactions in Favor of Self and Relatives.....	11
4.7.2 Accepting and Giving Gifts.....	11
4.8 Political Activities.....	12
4.9 Doing Business with the Company after Leaving the Company.....	12
4.10 Protection of Trade Secrets and Confidentiality.....	13
4.10.1 Privacy Implementation Principles / Data Privacy.....	13
4.11 Occupational Health and Safety.....	14
4.12 Use of Company Assets.....	14
5 Ethics Committee.....	15
5.1 Grievance Mechanism, Investigation of Grievances, Decision and Sanction.....	16
6 Relevant Documents.....	17

Approved By

Yakup Birinci – CEO

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,

Approved By

Yakup Birinci – CEO

information and information resources, documents, communication tools and communication channels, software and cash.

4 Implementation

4.1 Organization

A transparent and lean organizational structure has been established, which adopts a teamwork approach in its activities and operations, is mutually auditable and compliant with contemporary management systems.

4.2 Compliance 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.

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 Turkey 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.

4.2.1 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.

Approved By

Yakup Birinci – CEO

4.3 Business Ethics

The employee carry out all of their tasks in line with the laws and regulations, general company policies and principles. The approach adopted by our company is predicated upon compliance with legal regulations in every respect and the practices do not differ based on processes, individuals, and companies. The company does not accept corruption or bribery during any of the processes related to the works being carried out and it does not offer corruption or bribery to facilitate the processes. We adopt fair competition in all our commercial transactions, and we comply with all rules and regulations regarding transparency. We comply with applicable laws and regulations (not only employment and discrimination laws but child labor laws, health and safety laws, human rights laws, antitrust laws, export and trade control laws, environment laws) in all of our activities.

4.4 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.

4.5 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,

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.

4.6 Our Responsibilities to Our Stakeholders

Approved By

Yakup Birinci – CEO

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. ,

4.6.1 Financial Responsibility

As a taxpayer, our company carries out tax management within the legal limits. The taxes that have to be paid are not disregarded, delayed or infringed. The fiscal legislation is followed regularly, the changes and updates in the legislation are reflected accurately in the fiscal processes in due time.

4.6.2 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.

4.6.3 Our Responsibilities to Our Customers / Customer Orientation

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 processes are being planned and implemented with the objective to keep customer satisfaction at the highest level possible. These processes fully meet the expectations of our customers.

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.

Approved By

Yakup Birinci – CEO

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.

4.6.3.1 Product

Our objective is to produce high quality products that meet customer demands and other legal requirements at once. As part of our production processes, we adopt the zero defect principle. It is among our basic principles to work on product development and new product design in line with certain goals and strategies and working to produce our own specific products. We do not have counterfeit products from our customers, competitors or suppliers.

4.6.4 Our Responsibilities to Our Suppliers / Procurement

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.

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. For the procurement of all kinds of products and services that we might need to purchase, our company prioritizes that our suppliers also comply with the laws, regulations and our company's policies.

4.6.5 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.

4.6.6 Our Responsibilities to Our Employees / Human Rights and Working Conditions

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.

Considering that our employees represent us in the workplace and in the companies, they go to, we do not avoid the necessary training and investments for their personal and technical development. We create a comfortable and

Approved By

Yakup Birinci – CEO

peaceful working environment for our employees and ensure that they fully benefit from their personal rights. We encourage and guide our employees to be open to continuous development and learning.

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.

We ensure that our staff can work in a peaceful and safe environment while developing their skills and abilities. It is of utmost importance that every employee embraces the responsibilities related to his/her position and is aware of his/her work. In order to assist the development of our personnel, we organize trainings either pre-planned or according to their needs from the moment they are hired. Our employees have the right to form a union, become a member of a union or enter into a collective bargaining agreement of their own volition. In addition, employee representatives elected by employees ensure an effective dialog between management and employees.

As an organization operating on a global scale, Birinci Otomotiv takes the Universal Declaration of Human Rights (UDHR) as a guide and adopts an approach that respects human rights towards its stakeholders in the societies in which it operates. It is Birinci Otomotiv's fundamental principle to create and maintain a positive and professional working environment for its employees. Birinci Otomotiv acts in accordance with global ethical principles in matters such as recruitment, promotion, career development, wages, benefits, and diversity, and respects the rights of its employees to establish and participate in non-governmental organizations of their own choice. Birinci absolutely does not tolerate forced labor, child labor, all forms of discrimination and harassment.

Birinci Otomotiv treats all employees honestly and fairly, avoids discrimination and assumes the responsibility of providing a safe and healthy working environment that respects human dignity.

Birinci Otomotiv may also consider applying additional standards for disadvantaged groups that are more likely to be exposed to Human Rights violations. Birinci Otomotiv considers the special circumstances of minority groups (women,

Approved By

Yakup Birinci – CEO

children, people with disabilities, indigenous people, ethnic, religious, and linguistic minorities, migrant workers and their families). It also takes care to respect the rights of all its employees, shareholders, Business Partners, customers, and anyone else affected by its products or services in connection with its activities.

4.6.6.1 Working Hours, Wages and Benefits

Birinci Otomotiv complies with local legal working hours in order not to exceed the maximum weekly working hours in the countries where it operates. It is very important that employees take regular breaks, vacations and establish a productive work-life balance.

The wage determination process is established competitively according to the relevant sectors and the local labor market and according to the provisions of collective bargaining agreements for unionized employees, and a policy of equal pay for equal work is adopted. All wages, including social benefits, are paid in accordance with applicable laws and regulations. Birinci Otomotiv employees comply with the legislation governing working conditions in the countries in which they work.

4.6.6.2 Equality

All our employees are equal before the company regardless of language, religion, educational status and gender. We apply recruitment, promotion, dismissal, leave, wages, benefits and training activities fairly within the frameworks set by law. Birinci does not tolerate slavery, servitude, forced labor or human trafficking.

4.6.6.3 Child Labour and Forced Labour

As Birinci Otomotiv, we strongly oppose child labor that causes physical and psychological harm to children and takes away their education right.

Birinci Otomotiv is against all forms of involuntary and forced labor. It tolerates slavery and human trafficking in accordance with the conventions and recommendations of ILO and expects all its business partners and suppliers to act accordingly.

4.6.6.4 Woman Rights

Birinci Otomotiv embraces the principles that businesses have a stake and responsibility in gender equality and women's empowerment, in line with international labor and human rights standards.

4.6.6.5 Motivation

The working environment created within the company allows employees to participate in the structure and functioning of the company while taking individual responsibilities. All suggestions for improving quality and production are taken into consideration and supported. Employees are involved to the maximum extent possible in making and implementing managerial decisions.

4.6.6.6 Ethical Recruitment and Diversity

As Birinci Otomotiv, we observe internationally recognized ethical values in our recruitment processes. In this context, by offering equal opportunities to all candidates, no discrimination is made in terms of race, gender, color, nationality, religion, age, disability, sexual orientation and political opinion, and no questioning is made during recruitment interviews.

Approved By

Yakup Birinci – CEO

4.6.6.7 Discrimination

Birinci Otomotiv expects all its employees to act with sensitivity against discrimination in their behavior towards each other. The principle of zero tolerance against discrimination is adopted in all recruitment, promotion, appointment, and training processes.

Any form of discrimination and disrespect based on race, gender, color, nationality, religion, age, disability, sexual orientation, and political opinion is not permitted. Birinci Otomotiv takes care to treat its employees equally by providing equal rights and opportunities.

4.6.6.8 Employee Satisfaction

We carry out activities to increase the satisfaction level of our employees and to ensure that they are motivated in their work.

4.6.6.9 Freedom of Association and Collective Bargaining

Birinci Otomotiv respects the rights of its employees to ~~belong to~~ **join** a ~~trade~~ union and to bargain collectively without fear of reprisal and is committed to constructive dialogue with the freely elected representatives of its employees, represented by a legal ~~trade~~ union.

4.6.6.10 Health and Safety

Our company cooperates with private and public forces to ensure the safety of the company assets, employees, customers and suppliers during their visits to our company.

One of the most important priorities of Birinci Otomotiv is to protect the health and safety of its employees and other persons who are in the working area of Birinci Otomotiv for any reason. Our company provides a safe and healthy working environment. When necessary, security services are provided in a manner that respects the dignity, privacy and reputation of each person.

If unsafe conditions or behavior are identified in the workplace, we immediately take the necessary measures to ensure the health, safety and security of customers and employees.

4.6.6.11 Harassment and Violence

Birinci Otomotiv is committed to providing a working environment where violence, harassment is not tolerated and ~~where~~ there are no conditions that threaten safety or are offensive. Therefore, it does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse or threats.

4.6.6.12 Personal Development

Birinci Otomotiv supports its employees with internal and external trainings by providing them with opportunities to develop their talents and potential.

Birinci Otomotiv is committed to providing a working environment where violence, harassment is not tolerated and where there are no conditions that threaten safety or are offensive. Therefore, it does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse or threats.

Approved By

Yakup Birinci – CEO

4.6.7 Our Responsibilities to Environment and the World

As Birinci Otomotiv, we expect the same sensitivity and awareness from our employees within the understanding of a company that is environmentally conscious and sensitive to the environment it lives in. We support environmental protection and ecological life and try to comply with the laws and regulations established in this direction. We adopt 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 generated during production, to ensure the recovery of those that can be transformed and to reduce waste as much as possible as our company culture and we take care to make it sustainable.

Beyond fulfilling our legal responsibilities for the protection and improvement of nature and the environment, we are people who work voluntarily to increase the love of nature and environmental awareness, and we spread this characteristic to other segments of society. In all corporate areas, Birinci Otomotiv employees also take measures to protect the environment and report violations to their supervisors and/or senior management to 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 ensure that all activities to protect the environment are continuously improved. We pay attention to the development and use of environmentally friendly technologies and encourage behaviors towards this end. With the awareness that the resources of our country and the world are not unlimited, we focus on reducing waste and energy consumption and try to prevent all kinds of waste.

Our principles include being respectful to the environment and society, preventing harmful effects on the environment at the source, complying with legal regulations and other conditions, reducing and recycling waste that may occur.

4.6.8 Our Responsibilities to Society and Humanity

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

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

We carry out our activities in the fields of education, culture and social assistance on an institutional basis. We believe that education is very important for humanity, and we work to raise the level of education of the young population of our country.

The Company is sensitive to the traditions and cultures of the countries in which it operates.

4.7 Conflict of Interest and Misconduct

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

We expect our employees to put the interests of the company above their own interests. Our employees may not use their title, position and company information to benefit themselves or their relatives.

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

Approved By

Yakup Birinci – CEO

Employees may not directly or indirectly derive personal gain from company activities and all transactions and contracts to which they are a party.

4.7.1 Transactions in Favor of Self and Relatives

It is essential that all employees who are related to each other in the company do not have reporting ties with each other in the same organization or 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 recruitment officials who are in a position to make decisions in recruitment processes must take measures to eliminate conflicts of interest in the event that they are related to a candidate who has applied for a job, including spouse and third degree. Managers who are in a position to make hiring decisions cannot hire their spouses, close relatives and relatives of these people. This can be achieved by involving alternative human resources officers who do not have a conflict of interest. The most important criterion in recruitment and employment is to look for qualifications suitable for the job and to provide equal opportunity without any discrimination.

This can be achieved by involving alternative human resources officers who do not have a conflict of interest. The most important criterion in recruitment and employment is to seek qualifications that are suitable for the job and to provide equal opportunity without any discrimination.

Employees must not have any financial interest of themselves, their spouses and relatives, including third degree relatives, in any organization that is in a competitor, supplier or customer relationship with the company or in an effort to do business with the company, in a way that constitutes a conflict of interest. It is essential that Company employees are not in a partnership, board membership, consultancy or employee relationship with these organizations. In case of any commercial relationship with 3rd parties, such commercial relationship becomes valid upon the approval of the Board of Directors.

It is essential that the Company's employees do not directly or indirectly engage in activities that require them to be considered as 'merchants' or 'tradesmen', and that they do not work for another person and/or company for a fee or similar benefit, under any name whatsoever, during or outside working hours.

Personnel working as arbitrators, mediators and experts assigned by judicial or administrative authorities are excluded from this restriction.

4.7.2 Accepting and Giving Gifts

Company employees must not ask for gifts, benefits, assistance, hospitality, special discounts, commissions or discounts for their own benefit, which may affect their impartiality, decisions and behaviors, and must not accept such offers. Personal gain by using the name of the Company is grounds for termination of employment contract. Company employees may not directly benefit from free deliveries or all kinds of gifts, hospitality and similar items made on behalf of the company or members of the board of directors. On the other hand, our employees may not accept gifts and/or cash money from any company or organization, except for very symbolic gifts with a material value not exceeding 10% of the minimum wage, which everyone can easily obtain. We expect our employees to reject any person or organization that makes such attempts, and then inform their department supervisors, managers or directly the Ethics Committee about such actions and attempts. Any gift received by department managers or the board of directors within the company will be given to the finance directorate with a report to be raffled to the employees and will be kept in the finance safe.

Approved By

Yakup Birinci – CEO

Our employees may not accept cash or cash equivalent gifts, regardless of the amount, or borrow money from suppliers, consultants, competitors or customers.

Our employees may organize entertainment and dining activities and participate in similar activities in internal and external activities to the extent that they do not damage the image of the company. In seminars and similar organizations attended on behalf of the company, gifts other than awards, plaques, plaques, certificates, etc. with symbolic value as a memory of the day cannot be accepted.

Our employees are expected to pay attention to situations that may create potential conflicts of interest in terms of influencing decision-making processes in activities (entertainment, free education, seminars, accommodation, trips, meals, etc.) sponsored or undertaken by third parties or institutions. Employees and managers cannot accept any cooperation that will provide commercial and/or moral benefits to the organizations visited or cooperated with in such activities. The Company is aware that the rejection of such offers in certain situations may adversely affect the relations with suppliers, customers, etc. For this reason, free conferences, promotional meetings, training etc. from our suppliers or customers, organizations open to general participation, sportive and similar activities can only be accepted with the written approval of a senior manager.

Our employees may not give gifts to companies and individuals with whom they have a business relationship, except for gifts prepared by the company for promotional purposes to third parties. All gifts to 3rd parties must be approved by the company's general directorate or board of directors. If not approved, the equivalent of the gifts given will be obtained from the person concerned and the matter will be referred to the disciplinary board.

Bribery and giving, receiving or offering commissions to the detriment of the company are unacceptable under any circumstances. While carefully avoiding unethical behaviors such as bribery, corruption or giving and accepting products and services such as gifts, etc. in excess of the intended value, and abuse of office, we support efforts to eliminate such crimes.

4.8 Political Activities

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

Employees should avoid 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 resources belonging to the company cannot be used in political activities carried out individually.

Political propaganda cannot be made during working hours and in the workplace environment, and the time of other employees cannot be taken regarding these activities.

Company employees may not share their political views on the company's social media and mass communication tools and on channels that mention the company name.

Employees may not make untrue posts on their social media accounts and other relevant media tools in a way to damage the name and image of the company.

4.9 Doing Business with the Company after Leaving the Company

In order for employees leaving the company to be able to work for the company as a salesperson, contractor, consultant, or in similar ways, they must not have a previous disciplinary record in the organization;

No disciplinary record about him/her,

No conflict of interest due to the duties undertaken is required.

Approved By

Yakup Birinci – CEO

For those who leave their jobs to do business with the company, the above conditions must be met and the approval of the board of directors is required.

4.10 Protection of Trade Secrets and Confidentiality

For us, confidentiality includes all kinds of information belonging to the customers and suppliers we work with, as well as information about our company that may create disadvantages in market competition 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 events related to marketing and sales, launches, trade secrets, personal information of our employees, confidentiality agreements signed with customers, suppliers or third parties.

We act with the awareness that leaking any information belonging to us and our customers from inside the company to outside is an ethical violation, regardless of the purpose it serves. We do not share the information of any of our customers and suppliers with third parties and do not use it for our purposes and interests. We do not share the personal information of our employees with any company or institution, except in cases required by law and obligations. At the same time, out of respect for the private life and personalities of our employees, we pay attention to their privacy rights regarding the use of computers, e-communications and the internet, and act within the framework of legal obligations.

We expect our employees whose employment contract is terminated not to take confidential information, documents and projects they are involved in, all kinds of individual or group works and their results out of the company when leaving the company, to deliver them to the relevant department supervisors they work with and to act within the framework of ethical rules. We inform you that legal procedures will be put into effect immediately when a contrary situation is detected.

Confidential information includes, but is not limited to, intellectual property rights and all kinds of innovations belonging to the company, as well as the database, printed communication materials, business processes, advertisements, product packaging and labels, business plans (marketing, product, technical), business strategies, information on strategic partnerships and partners, financial information, personnel information, salary, premium, bonus, etc. based on the employment relationship. All kinds of wages and wage-like benefits, supplier, customer lists, prices, product designs, know-how, specifications, identification information of potential and actual suppliers and customers, all kinds of written, graphic or machine-readable etc. information.

4.10.1 Privacy Implementation Principles / Data Privacy

The principles that employees of the Company must be sensitive to and comply with regarding confidential information are stated below;

Confidential data and information cannot be disclosed to third parties unless disclosure is mandatory in accordance with judicial decisions and legislation. While fulfilling their duties, employees cannot make binding statements binding the company by exceeding their authority and cannot make deceptive and unrealistic statements. If the subject is beyond the authority and knowledge of the company employee, he/she directs it to the relevant unit or personnel. The persons who will make statements on behalf of the company are determined by the management.

Confidential information must not be altered, copied, or destroyed. Necessary measures are taken to ensure that information is kept carefully, stored, and not disclosed. Changes to information are recorded together with its history. Confidential information must not be discussed in dining halls, cafeterias, elevators, service cars and similar public places.

Confidential documents and information must not be taken out of the company. In mandatory cases where it must be taken out of the company, the person responsible for the information must obtain approval from senior management and/or the board of directors.

Approved By

Yakup Birinci – CEO

Passwords, user codes, authorizations and similar identifying information used to access company information systems must be kept confidential and must not be disclosed to anyone other than authorized users.

If information is shared with third parties and/or organizations for the benefit of the company, a confidentiality agreement is signed for information sharing or a written confidentiality commitment is obtained from the other party to ensure that these persons and organizations understand their responsibilities regarding the security and protection of the shared information. It is essential to get support from the legal department in these applications.

All official disclosures must be announced to suppliers, customers, and the public in an equitable, complete, simultaneous and understandable manner through the units designated by the company.

Unfounded statements and/or gossip about persons or organizations working in the Company are prohibited.

Personnel information such as wages, fringe benefits, etc., which reflect the company policy and are personalized, are confidential and should not be disclosed to anyone other than authorized persons. Employee information is sent in a personalized manner. Employees may not disclose this information to others or put pressure on other employees to disclose the information. Otherwise, it is a crime that will be handled by the ethics committee.

Birinci Otomotiv applies high-level data privacy standards to protect the personal information of its employees. Data privacy standards are applied in compliance with relevant legislation.

Even if it is not stated in writing that it is confidential, the confidentiality of all kinds of information and documents of the nature specified in the definition must be protected, and this responsibility of our employees continues during their employment with the company and even if they leave the job.

4.11 Occupational Health and Safety

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

All necessary precautions are taken to ensure the best possible protection against health and safety risks in the company's workplaces.

Policies are developed to reduce risks and the results obtained are checked according to the applicable standards to ensure that these safety measures are properly implemented.

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

Continuous trainings on occupational health and safety are provided and employees are regularly raised awareness on this issue. It is ensured that personal safety equipment required by the job is worn, and it is the responsibility of each employee to report risky situations.

All issues related to occupational health and safety that could potentially harm employees or the company must be immediately reported to the OHS specialist and unit supervisors.

It is the basic policy of our Company to ensure the health and safety of our employees beyond legal obligations. Maximum effort is made to prevent risks, to create occupational safety awareness among employees, to update their knowledge through continuous trainings and to protect their health.

4.12 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

Approved By

Yakup Birinci – CEO

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 (employees, suppliers, customers and third parties and organizations with whom they have all kinds of business relations) 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 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.

Approved By

Yakup Birinci – CEO

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 Şekerpinar Çayırova Kocaeli / Türkiye"

Via Ethics Notification Line; ++90 262 723 42 00 / 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 Grievance Mechanism, Investigation of Grievances, 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.

Approved By

Yakup Birinci – CEO

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

Approved By

Yakup Birinci – CEO

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

© Birinci Automotive AŞ - This document belongs to Birinci Otomotiv AŞ and may not be reproduced, distributed, or used as a reference in external publications, in whole or in part, in any language, electronically or in any other form, for any purpose, without written permission. Controlled and uncontrolled distribution of the document is performed in accordance with the procedures of Birinci Otomotiv AŞ.

Approved By

Yakup Birinci – CEO