

Chapter 10 - Code of Conduct and Ethics

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Code of Ethical Conduct **Handbook**



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A MESSAGE FROM THE PRESIDENT

Dear Colleagues,

The Code of Ethical Conduct Handbook is a guide that outlines certain ethical principles that our managers, employees, and contracted business partners must follow in their daily work.

The guidelines set forth in this book have been developed by reimagining the ethical principles we have strived to uphold for 30 years, in a way that facilitates our ability to conduct business to the highest standards.

The foundation of our Code of Ethics is our belief that leading with honesty and unconditional respect for people is an absolute prerequisite for our success.

Our Board of Directors is fully committed to these ethical guidelines, which define our business practices and culture.

I strongly urge you to take the time to familiarize yourself with our Code and reaffirm your commitment to it.

Our employees who focus on doing their jobs correctly and ethically will certainly receive the recognition they deserve.

I recommend that you discuss any questions or concerns regarding ethics with your managers and our Human Resources Department; if that is not sufficient for you, I recommend that you consult with our Internal Audit Department, which operates independently to prevent ethical violations.

Ayhan VEREKABAN
Chairman of the Board

Message From The Internal Audit Department

Dear Sistem Aluminum Employees

As employees, we are all responsible for protecting the reputation of our Company, which is the very reason for our existence. This reputation can only be safeguarded if we adhere to a set of ethical guidelines while performing our daily duties.

Our Company's **Code of Ethical Conduct** informs us of the most appropriate and ethical behaviors to follow during our business relationships both within and outside the Company.

From now on, you bear a personal responsibility to learn and comply with our Code of Ethical Conduct. Additionally, you have a new obligation to report any ethical violations you witness to the appropriate authorities. We refer to this obligation as **the Mandatory Ethics Reporting Requirement**.

Failing to report ethical violations you witness in your workplace may exacerbate the harm those violations cause to the Company and our employees. Furthermore, intentionally concealing an ethical violation you witness could, in some cases, even lead to you being accused of participating in that violation.

In accordance with our company's **Open Door and Anti-Retaliation Policy**, your supervisors will always keep their doors open to you so that you can share your work-related concerns and complaints—including any ethical violations you witness—and will listen to you with due attention. Our company's **Respect for Employees and Anti-Harassment Policy** also provides you with additional safeguards in this regard.

Despite all these safeguards, if you still feel hesitant to discuss the ethical violations or misconduct you have witnessed with your managers or the Human Resources Department, you may submit your reports and notifications directly to the Internal Audit Department. You may submit your reports to us either anonymously or with your identity disclosed, in writing or in person.

Our company has established a 24/7 **Ethics Helpline**, accessible to everyone, to ensure you can make your reports in confidence. This line is operates under the supervision of an external expert organization, and your reports are forwarded only **to our Ethics Compliance Team**—which operates under the leadership of the Internal Audit Department—and are not reported to other managers.

The Internal Audit Department is a body directly reporting to the Board of Directors and operates independently in addressing violations and breaches of ethical conduct. Additionally, if necessary, we bring certain significant ethical violations back to the agenda and discuss them **at our Company's Ethics and Gender Equality Committee**.

Your honest and well-intentioned reports of ethical violations will help ensure that common issues we may encounter in the workplace are resolved before they escalate.

Submitting your reports along with concrete evidence and **at least two proposed solutions** will help expedite the resolution of these issues.

Ethics Helpline

What is it? What does it do?

The SİSTEM ALÜMİNYUM Ethics Hotline is an ethics reporting channel open not only to our employees and business partners but to everyone.

For SYSTEM ALUMINUM, values such as integrity, unity, and respect are not just words—they are minimum standards.

If you believe our employees have violated the law, please do not hesitate to initiate legal proceedings. If you are in the right, we will support you in ensuring that those responsible face the necessary consequences.

If you wish, you may report any employees who violate the law or **our Code of Ethical Conduct** by contacting **our Ethics Hotline**, the contact information for which is provided below.

Our Ethics Helpline is entirely independent of the Company, and your reports and notifications will be reviewed by KPMG, a firm completely independent of our Company,

and reported **to the Ethics Compliance Team** led by the Internal Audit Department.

We take all ethical violations reported **to our Ethics Helpline** in good faith and with honesty seriously and follow through on them.

Anyone wishing to share information or concerns regarding a potential violation of **our Code of Ethical Conduct** or any law may contact this hotline 24/7 without exception.

The Sistem Aluminum Code of Ethical Conduct Handbook transparently informs all stakeholders about our Company's fundamental internal and external ethical standards.

For more information, please review the following Corporate Governance documents:

- **Our Open Door and Anti-Retaliation Policy**
- **Our Policy on Respect for Employees and Prevention of Harassment**
- **Our Supplier Code of Conduct**

Important Note:

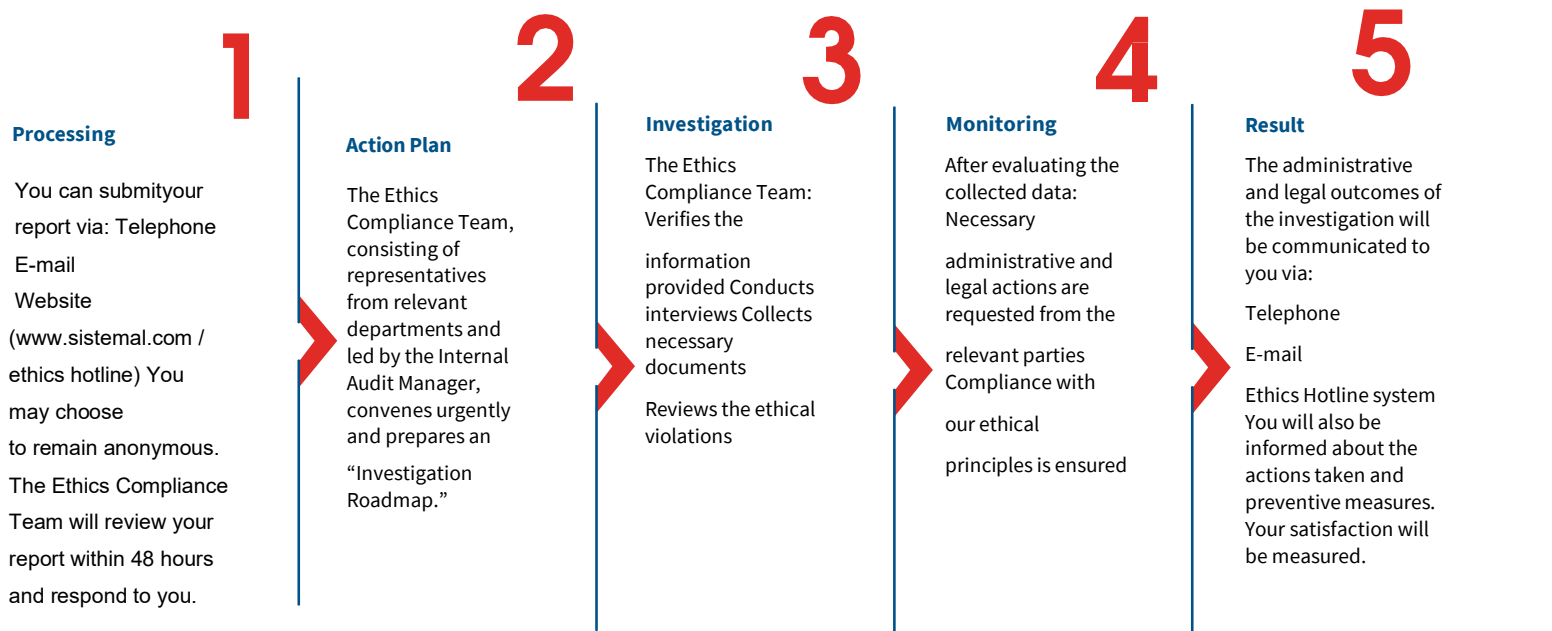
The Ethics Hotline is a tool provided for your use solely to address concerns, reports, and complaints regarding violations of **our Code of Ethical Conduct**.

Temporary disruptions, service deficiencies, and **unintentional** operational or administrative issues in personnel management that may arise during the Company's commercial activities, or certain discussions that could be considered normal due to constructive internal competition in the workplace, fall outside the scope of the Ethics Helpline.

You may report such issues **to the Suggestions and Complaints Hotline** listed in the Contact section of our website, either verbally or in writing, and you will receive a response within 48 hours.

Ethics Helpline

How does it work?



Rest assured!

Our company has implemented the following measures to ensure you can report unethical behavior to us without hesitation.

Our Doors Are Always Open!

Many issues can be resolved before they become major problems. That is why we always encourage you to voice your ideas, concerns, and complaints and to ask questions.

Retaliation Will Not Be Tolerated!

If any of our employees takes retaliatory action against another employee or a business partner who has reported a violation of the Code of Ethical Conduct in good faith and with honest intentions, our Company will take appropriate action. Retaliatory actions such as harassment, demotion, termination, raising sales prices, or halting purchases are prohibited within our Company. The fact that a report made in good faith to us contains INCORRECT INFORMATION does not constitute an exception.

Your Identity Will Be Kept Confidential!

It is important to us that you feel safe when making a report. If you report conduct that violates ethical standards to us, we will keep your identity confidential and will not disclose it without your consent.



Ethics Hotline Contact Information
0850 220 56 61

etiksisitem@kpmg.com.tr
etikdestekhatti.com

Basic Ethical Conduct Our Principles



••WE

We avoid conflicts of interest. We do not abuse our position. We do not engage in favoritism. We do not work for outside entities.

We do not tolerate cheating or misconduct. We do not accept improper gifts. We avoid discrimination and harassment. We oppose substance abuse. We do not engage in politics at work. We use social media responsibly.

1

We Avoid Conflicts of Interest

A **conflict of interest** refers to a situation where an employee's personal interests undermine their ability to make fair decisions on behalf of the Company. A conflict of interest does not always lead to a conflict of interest relationship, but because it increases this risk, conflicts of interest are unacceptable in our Company.

A **Conflict of Interest**, on the other hand, is a situation where a Conflict of Interest has turned into abuse. The abuse in question here is of the "corruption" type.

Below are some examples of conflicts of interest and conflicts of interest:

- **Conflict of Interest:** An employee or a close relative of an employee holds a significant stake in any supplier, contractor, customer, or competitor (*for example: An employee in the transportation department owns several trucks in a transportation company that the Company uses on a spot basis*).

- **Conflict of Interest:** An employee or a close relative is deriving personal gain by taking advantage of the Company's corporate resources and opportunities (*e.g., a member of the Company's purchasing department is procuring products from a relative at an inflated price*).

- **Conflict of Interest:** An employee or a relative demonstrates a commercial interest in an investment or business known to be of interest to the Company (*e.g., seeking to sell a service or goods to our Company*).

- **Financial Relationship:** An employee or a relative receives payments or other financial benefits from any of the Company's suppliers, competitors, or customers (*for example: an employee receives a direct commission from a customer based on sales made to that customer*).

- *The term "close" in this provision includes parents, spouses, relatives up to the third degree, in-laws, step-relatives, individuals living in the same household on a regular basis, or those in a romantic relationship.*

As an employee, you must always avoid any situation that could create a conflict of interest—or even give **the impression** of creating one.

Regardless of whether **it is profitable for our company or not**, you may not enter into any Conflict of Interest with our suppliers, contractors, customers, business partners, or competitors, nor may you use the authority granted to you to engage in any commercial transaction or agreement that could also serve your own interests.

In all purchasing and sales transactions without exception, any purchase or sale from Company employees or their close relatives and must be reported to **the Internal** **to the Internal Audit Department**. Any such purchase or sale made without prior notification to the Internal Audit Department will be considered a direct violation of ethics.

If you are aware of or suspect a conflict of interest or a conflict of interest relationship in your work environment, you must immediately report this situation to your managers; if you do not receive a response or feel hesitant to speak up, you must report it to the Internal Audit Department.

2

We Do Not Abuse Our Position

Abuse of Authority refers to an employee using certain powers granted by the Company for their own benefit or that of their relatives. This constitutes a behavior or attitude arising from the use of personal authority, which we will evaluate within the scope of **Conflict of Interest**.

You may not use the power you hold in the purchasing and sales transactions conducted by SİSTEM ALÜMİNYUM to obtain personal gains, either directly or through a relative.

If such a situation arises, it will be addressed under **the Conflict of Interest provisions** outlined in the preceding section and is strictly prohibited by our Company.

All business relationships you establish with SYSTEM ALUMINUM's suppliers, contractors, customers, and business partners are subject to the same prohibition.

Furthermore, you may not use the benefits provided to you in connection with your duties—such as credit cards, meal cards, and company vehicles—or any confidential information or other privileges for your personal gain.

Similarly, you are prohibited from using the personal reputation you have established through your employment at SİSTEM ALÜMİNYUM for your personal benefit.

(For example: You may not use the strong relationship you have established with banks through the Company to obtain an unreasonably high personal loan from those same banks. You may not use the reputation you have established through the Company to rent a car at an unreasonably low rate from a car rental company that the Company uses.)

If you suspect that individuals in your work environment are abusing their positions, report the situation immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.

• The term “close” in this provision includes parents, spouses, relatives up to the third degree, in-laws, step-relatives, individuals living in the same household on a regular basis, or those in a romantic relationship.



3

Favoritism We Do Not Tolerate

Favoritism or **nepotism** is the situation where an employee makes subjective and unfair decisions regarding their relatives within or outside the Company.

This situation could lead to the hiring of unqualified individuals or to performance evaluations based on personal relationships. Allowing relatives to hire one another within the Company, or authorizing them to rate and evaluate each other's performance, would undermine fairness and disrupt internal harmony.

At SYSTEM ALUMINUM, it is prohibited for **relatives** to hire one another or to be employed in positions where they can make decisions that influence one another.

Additionally, if you or your relatives hold influential positions with SİSTEM ALÜMİNYUM's suppliers, contractors, customers, **or even competitors**, this may prevent you from acting fairly when making business decisions.

If our employees or their close relatives hold an active role in supplier, contractor, customer, or competitor companies, this may encourage such individuals to establish **a conflict of interest** and also falls under the scope of the "**Outside Work**" policy. Therefore;

If you need to contact a company in which you or your relatives hold an active role to conduct a commercial transaction on behalf of SİSTEM ALÜMİNYUM, you must report the situation to your managers and **the Internal Audit Department** before taking any action, or by notifying them.

If you suspect that an employee or an individual who influences our business is showing favoritism toward certain relatives who work at our Company or at affiliated companies, please report the matter immediately to your manager; if you do not receive a response or feel uncomfortable speaking with them, please report it to the Internal Audit Department.

Report it to the Internal Audit Department.



• The term "*close relative*" in this provision includes parents/spouses, relatives up to the third degree, in-laws, step-relatives, individuals living in the same household on a regular basis, or those in a romantic relationship.

4 | It Doesn't Work Outside.

Outside employment refers to a situation where an employee works directly for the Company's customers, contractors, suppliers, competitors, or firms from which the Company procures goods or services on a spot basis.

Company employees **may not take on a second job** with parties with whom SİSTEM ALÜMİNYUM has a business relationship, **even outside of working hours** at entities with which SİSTEM ALÜMİNYUM has a commercial relationship.

Employees are also strictly prohibited from spending any time during working hours on other personal or business matters.

It is also prohibited for SYSTEM ALUMINUM employees to work, either **during or outside of working hours**, while wearing clothing, displaying signs, or behaving in a manner that identifies them as employees of our Company.

Only individuals authorized by SYSTEM ALUMINUM may represent SYSTEM ALUMINUM externally.

If you suspect that an employee of our Company is working for another affiliated Company or on their own behalf "during working hours," report the situation immediately to your manager; if you do not receive a response or feel hesitant to speak up, report it to the Internal Audit Department.



5

We Do Not Tolerate Fraud or Misconduct

Fraud and Misconduct refer to the intentional and improper use of the Company's resources or assets, or the direct misappropriation thereof, by an employee or any individual with the power to influence the Company's operations.

SİSTEM ALÜMİNYUM is committed to fostering an honest, transparent, and good-faith work environment.

If any instance of misconduct is identified, we immediately initiate internal investigation and inquiry processes to identify those responsible and fulfill our legal obligations.

Fraud and embezzlement manifest in three ways:

- **Theft:** Direct theft or embezzlement through document forgery
- **Corruption:** Interference in purchases and sales
- **Report Manipulation:** Altering debt-credit, revenue-expense, or valuation levels directly or by manipulating dates

A few illustrative examples of embezzlement are listed below;

- **Misappropriation of money, materials, or other assets**
(e.g., directly stealing goods from the warehouse)
- **Presenting reports in a manner that differs from the actual facts for personal gain and with intent**
(e.g., falsifying timesheets and work reports)
- **Irregularities in purchasing and sales processes**
(e.g., obtaining personal gain from a supplier, contractor, or customer; bribery and kickbacks)
- **Using company funds and assets for purposes other than their intended use or for personal gain**
(for example: renting out a company vehicle or using it for personal gain)
- **Intentionally altering financial and operational transactions for personal gain**
(e.g., deleting customer receivables records as a favor or extending their due dates)
- **Intentionally presenting unauthorized expenses as if they were in accordance with Company procedures**
(e.g., collecting cash from the register using a fake taxi receipt)
- **Intentionally altering company documents with the intent to mislead users**
(e.g., secretly altering the subtotals on an inventory count report)

If you know that employees in your workplace have committed misconduct similar to the examples above, or if you suspect such misconduct, report the matter immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it directly to the Internal Audit Department.

6 Improper Gifts We Do Not Accept

Conflicts of interest are not always obvious; they can arise suddenly despite the best intentions of employees.

Our company supports the preservation of business courtesy. However, an employee or their close relatives may not accept a gift of significant monetary value from the Company's customers, contractors, suppliers, or business partners.

Services, entertainment, and invitations are considered gifts.

If the monetary value of the gifts is negligible or symbolic, you may accept them only at regular intervals or on rare occasions.

If you accept a gift with a value exceeding **50 U.S. dollars** as a courtesy, you must report this in writing to the Human Resources Department!

If you suspect that any employee in your work environment is receiving gifts or hospitality from other companies, particularly at irregular intervals, report the situation immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.



7 Discrimination, harassment, and workplace bullying are avoided.

SİSTEM ALÜMİNYUM supports a work environment free from any form of verbal or physical harassment based on race, ethnicity, religion, physical or sexual orientation, or any other factor, as prohibited by law.

We aim to foster an open environment for discussion, particularly regarding concerns, distress, and complaints related to sexual harassment or gender discrimination.

Making certain personal preferences a prerequisite for employment at the Company or using them as criteria for hiring decisions, intimidating employees because of these preferences, threatening them, or engaging in any toxic speech or behavior that involves hostility or aggression toward them is strictly prohibited by our Company.

Bullying is, fundamentally, a situation in which one or more employees engage in social intimidation toward an individual or another group.
Harassment is a negative professional behavior that is prohibited by our laws.

If discrimination or workplace bullying is detected in our workplaces, it is evaluated as a disciplinary violation and punished.

Managers, officials, or individuals authorized by the Company who physically enter the Company's workplace and can influence the environment;

will face appropriate consequences.

Managers are the employees primarily responsible for maintaining a work environment completely free of harassment, bullying, and discrimination.

In this context, your responsibility is to fully understand that our Company needs diversity to be more productive and to demonstrate your respect for diversity through your actions.

If you suspect discrimination, bullying, or harassment in your workplace, report the situation immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to Human Resources or the Internal Audit Department.



8

We Are Against Substance Abuse

While we respect the right to privacy of personal information and the privacy of individuals, we view substance abuse as a serious issue that threatens employee health and workplace safety.

You may not use alcohol or illicit drugs during working hours while providing services to SİSTEM ALÜMİNYUM

This prohibition applies to everyone employed by suppliers, contractors, customers, and business partners who enter the workplace.

If you have knowledge or suspicion that “anyone” entering or exiting your work environment—or performing work in the same area with the Company’s permission—is under the influence of alcohol or drugs, report the situation immediately to your manager; if you cannot get a response or feel uncomfortable speaking up, report it to the Internal Audit Department.



9

We Do Not Engage in Political Activities at the Workplace

Political propaganda in the workplace can lead to legal consequences in our country, and depending on the nature of the activity, it may also cause other employees to feel discriminated against or harassed, thereby unnecessarily dampening morale.

As a Company employee, you may not pressure your coworkers to vote a certain way or to support a specific movement or candidate.

You may not engage in political activities during your work hours at the Company, nor may you use the Company's resources (including your work hours) for such purposes.

If you believe that anyone working in your department is engaging in political activities and using Company resources for this purpose—including during work hours—please report the situation immediately to your manager. If you do not receive a response or feel uncomfortable speaking up, please report it to Human Resources or the Internal Audit Department.



10

We Use Social Media Carefully

Only individuals authorized by the Company may use media and social media on behalf of SİSTEM ALÜMİNYUM.

Even for personal use, you must not negatively impact SİSTEM ALÜMİNYUM's image and reputation while using social media.

Whenever you mention SİSTEM ALÜMİNYUM on any online platform, clearly state your relationship with the Company and never discuss SİSTEM ALÜMİNYUM's commercial or confidential information in such environments.

Additionally, you may not use offensive language online that is discriminatory toward your colleagues or customers, or that could be construed as harassment.

Similarly, you may not make rude or negative comments about our customers or suppliers.

If you believe there are individuals in your work environment, or on media and social media, who are harming our Company, report the situation immediately to your manager; if you do not receive a response or feel hesitant to speak up, report it to the Human Resources or Internal Audit Department.



Internal Code of Conduct

Our Rules

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WE

- We keep our records and accounts accurately
- We retain our documents as required
- We protect our confidential business information
- We safeguard personal data privacy
- We uphold equal opportunity in the workplace

1

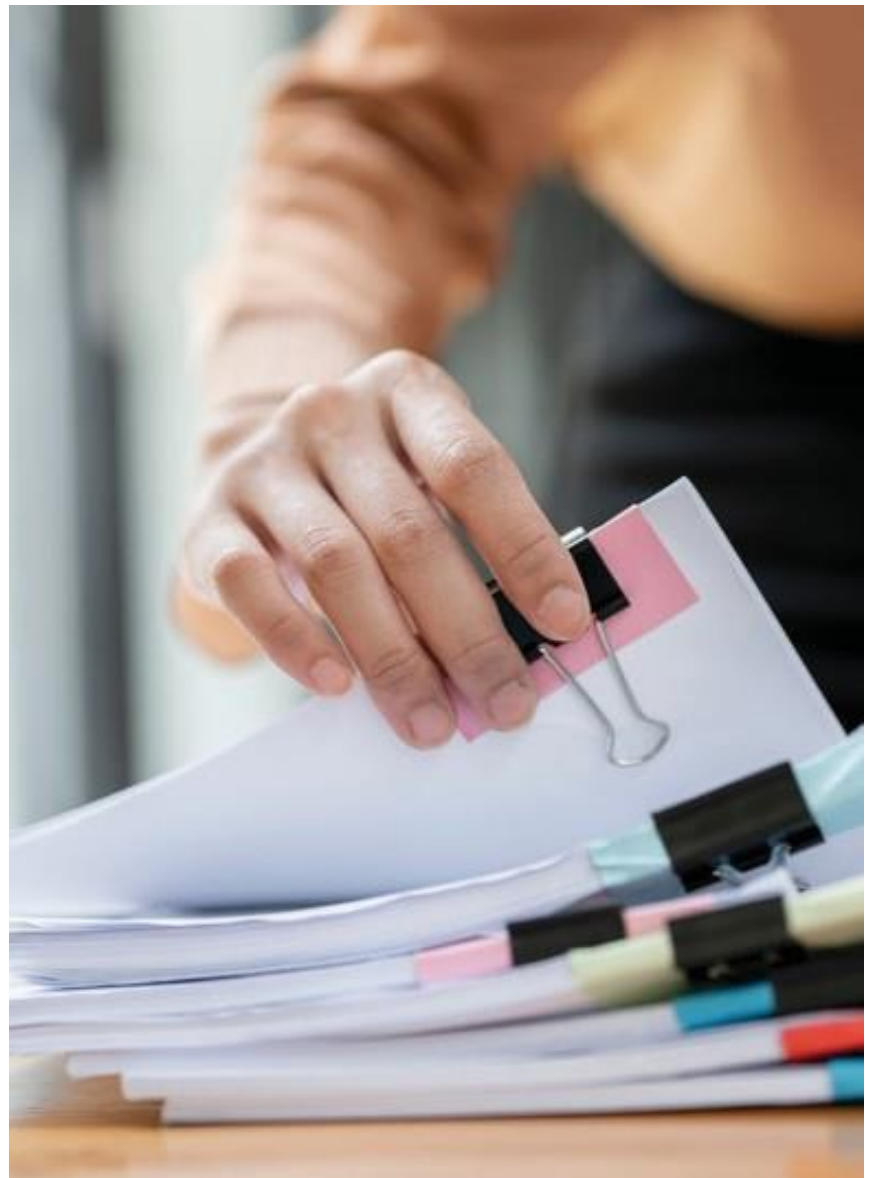
We Maintain Our Accounting Books and Other Records in Accordance with Procedures

Accurate record-keeping is crucial both for Company management and for maintaining the trust of our business partners.

Accurate and complete records are essential for tax purposes. Submitting complete records and books to the relevant government authorities is a legal requirement.

To ensure the company's records are supported by appropriate documentation, all employees must do their part.

If you suspect that the accounting processes do not accurately reflect the Company's operations or that certain records have been intentionally falsified, report this immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.



2

We Retain Documents as Required



Our Company is responsible for the retention and protection of documents, ensuring that company records are maintained, stored, and properly disposed of in accordance with business needs, applicable laws and regulations, and environmental, tax, employment, labor, and commercial legislation.

If you suspect that company records have not been properly protected or have been destroyed to conceal any facts, report this immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.

- The term “*company records*” in this section refers to all documents and records containing information used or developed by the Company, regardless of the form or medium in which they were created.
- The term “*documents*” in this section includes timesheets, slips, receipts, invoices, expense reports, payroll records, records related to employee benefits, and performance evaluations.

3

We Protect Confidential Company Information

The products, services, ideas, concepts, and other information we create or develop in the course of our daily business are valuable assets and proprietary property of our Company.

The law allows us to protect these assets.

It is in the Company's best interest to protect confidential and proprietary information and to prevent its unauthorized or improper disclosure.

Protecting confidential and proprietary information and preventing its unauthorized or improper disclosure is in the Company's best interest.

In our country, the disclosure of insider information by employees of publicly traded companies is classified as a crime of insider trading. Due to such laws, disclosing confidential company information to the outside may also constitute a criminal offense.

For these reasons, you must exercise extreme caution when using telephones, faxes, email, and other electronic means of transmitting and storing information.

Do not discuss the Company's w2q3opsensitive information in public places where others might overhear it. You must not disclose any confidential Company information to anyone outside the Company, as this information is the property of the Company.



If you suspect that employees or other individuals authorized by SİSTEM ALÜMİNYUM to access information have disclosed the Company's confidential and proprietary information to others, report the matter immediately to your manager; if you cannot obtain a response or feel uncomfortable discussing it, report it to the Internal Audit Department.

• The term "**confidential and proprietary information**" in this section refers to the Company's assets, including marketing plans, sales and marketing information, customer and employee records, warehouse procedures, research and development information, technical data, delivery methods, distribution methods, pricing information, business strategies, and information regarding new products and services.

4

We Protect and Use Personal Data Ethically

Our privacy principles apply not only to commercial information but also to personal information pertaining to the Company's employees, job applicants, consultants, customers, and other stakeholders. The Company protects and keeps confidential all such personal information in its possession:

Personal information is collected, processed, stored, and transferred with appropriate measures in place to ensure the necessary confidentiality, and access to such information is granted only to individuals with legitimate and legal grounds. All these processes must be carried out in compliance with the provisions of the Personal Data Protection Law No. 6698.



You may not share the information submitted by job applicants to our Company with others. Where necessary, the employee's consent is obtained regarding the collection, processing, storage, and transfer of their personal information.

Additionally, Company employees must be given the opportunity to view, review, and, if necessary, correct their personal information held by the Company.

If you believe that a Company employee is sharing personal information they have access to due to their position with others, or is using personal information for professional or personal gain, you must immediately report this to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.

5

We Support Equal Opportunity

Our managers bear primary responsibility for implementing this principle and ensuring that all relevant parties adhere to it.

Our company treats all employees and job applicants fairly and honestly, regardless of pregnancy, disability, or impairment, and provides equal opportunities to everyone.

The principle of non-discrimination based on race, color, religion, gender, age, disability, sexual orientation, or any other characteristic also applies to our hiring processes.

As an employee, it is your responsibility to recognize the need for equal opportunity and diversity in the workplace and to respect these principles.

If you believe that a company employee or any other official with influence over hiring has violated our equal opportunity policy, please report this immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, please report it to the Internal Audit Department.



External Ethical Conduct

Our Rules

WE

We do not

We compete fairly with our competitors. We compete ethically with our competitors. We obtain commercial intelligence through legitimate means. We conduct ourselves ethically in international trade. We provide the public with



1 Bribery

We do not give

It is prohibited for SYSTEM ALUMINIUM employees to make any payment to any person to secure an advantage in the sale of goods or services or to secure a benefit for the Company through the assistance of public officials.

When conducting mandatory interactions with our business partners and government authorities, you must exercise particular caution regarding issues of bribery and corruption.

In our country, there are laws and a code of ethics for public employees that prohibit making any payment or offering anything of value—either directly or indirectly—to public officials, or making any such offer or promise, with the intent to influence an official action or decision, expedite a process, secure or retain a business opportunity, or accelerate business matters.

No payment should be made to public officials, no benefit should be provided, and no gift or service should be offered to them if such actions are intended to influence their decisions or **could raise even the slightest suspicion** of such intent.



2

We Compete Fairly with Our Competitors

In all our business dealings, we always uphold honesty and fair competition in every respect.

It is prohibited for SYSTEM ALUMINUM employees to engage in unfair competitive practices in business, or to resort to unfair or deceptive acts or practices during sales and marketing.

This prohibition covers, but is not limited to, the following examples of intentional misconduct:

- Making false, misleading, or deceptive advertisements, or making any other false or misleading statements in connection with sales and marketing activities
- Offering bribes to employees of competitor firms or customers
- Making unfair or unjustified statements about competing products
- Failing to intentionally inform the customer about the differences between the Company's products and similar products purchased from a competing company

All employees of SİSTEM ALÜMİNYUM are prohibited from engaging in the above-mentioned and similar behaviors.

If you know or suspect that an employee has violated our anti-bribery policy, report the matter immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.



3

We Compete Legally and Ethically with Our Competitors

While competition laws are quite complex, it can be summarized that they prohibit agreements between companies that could undermine fair competition conditions—such as market prices and sales terms—between the Company and its competitors.

SİSTEM ALÜMİNYUM has prohibited the following actions to ensure compliance with competition ethics and to avoid even the slightest suspicion that its agreements violate competition laws:

- Engaging in discussions with competing firms or establishing other types of connections regarding price fixing, price setting, or discrimination
- Entering into agreements with suppliers or customers to restrict free trade in an unfair or improper manner or to exclude competing firms from the market
- Entering into agreements with rival companies regarding the regions or markets where rival products may be sold, or regarding the division of markets or customers
- Entering into agreements with other individuals or companies to boycott customer or supplier firms
- Price discrimination or dumping based on the market

As an employee, it is your responsibility to avoid all of the above actions within your area of authority.

You may not enter into agreements with competing firms regarding prices, terms of sale, costs, profits, profit margins, product or service offerings, production or sales volumes or capacities, market shares, the coordination of bidding processes, the division of sales territories, or the allocation of customer or product types.

If you believe that the ethical competition requirements outlined in this section are being violated in your work environment, report the situation immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.



4 Commercial Intelligence We Obtain It Ethically

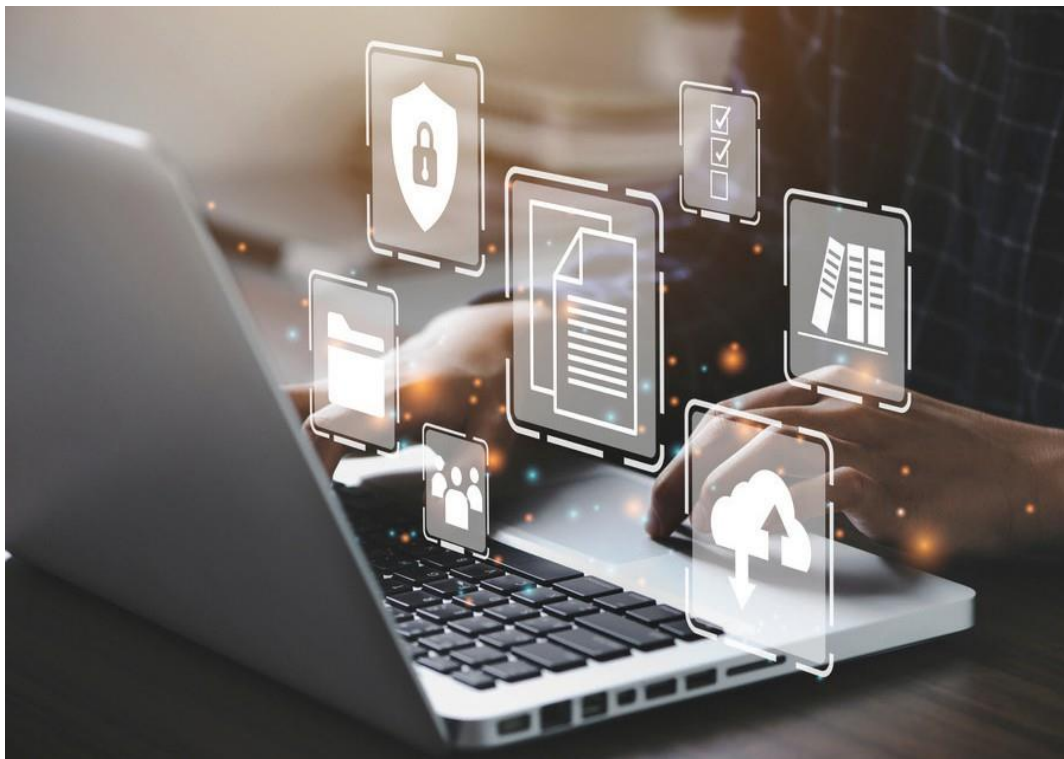
Collecting or using publicly available information about other companies is generally not contrary to law or ethics.

You are free to gather information about other companies using publicly available sources such as websites, scientific articles, public price lists, advertisements, brochures, public presentations, and customer conversations.

However, under no circumstances may you resort to unethical or illegal means—such as false or misleading statements, deception, theft, espionage, or bribery—to obtain information about other companies.

Similarly, you may not ask third parties to resort to such methods.

If you suspect that intelligence regarding business competitors is being gathered in your work environment through means other than those specified in this article, report the situation immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.



5

We Conduct International Trade We Do Business Ethically

Various laws exist in different countries that restrict or prohibit trade with certain countries and parties.

While most countries impose various restrictions on international trade (such as customs procedures), many countries restrict or prohibit commercial activities related to specific products and technologies.

On the other hand, legal procedures and documents valid in one country may not be valid in another.

Managers and staff responsible for the company's international operations must familiarize themselves with these laws and seek legal counsel if they have any questions or concerns.

If there are employees in your workplace who are violating international trade laws, including anti-dumping and customs laws, report this immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.



6

Requests from the Media and the Public Our Ethical Responses

SİSTEM ALÜMİNYUM is committed to providing accurate and reliable information to the media and the public.

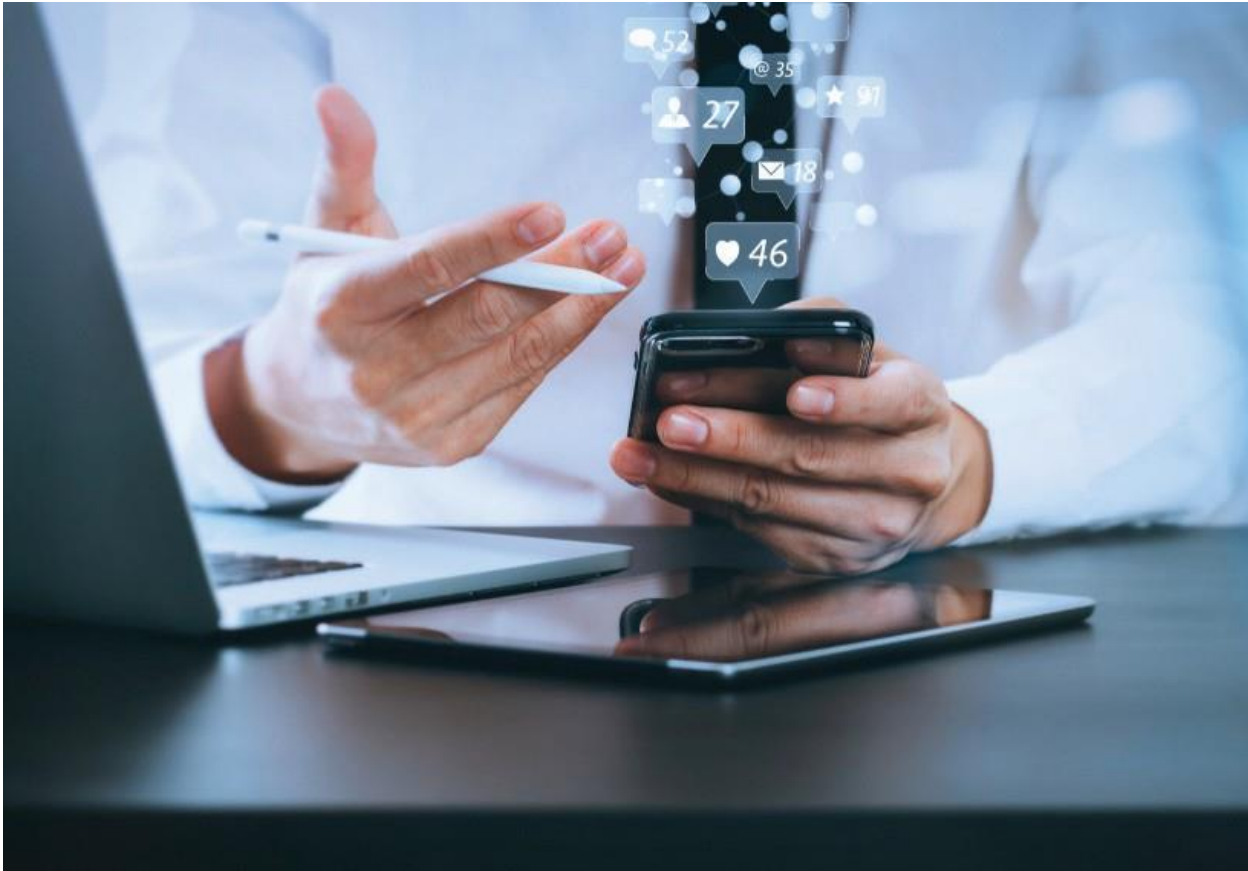
All public statements, including estimates and forecasts, press releases, speeches, and other communications, must be accurate, honest, timely, and reflect only the facts.

To ensure accuracy and consistency in information provided regarding our company, questions must be answered by a single designated person responsible for media relations.

Instead of directly answering questions from the media or other segments of the public, if you are asked for any information, you should take the name and phone number of the person requesting the information and report it to the responsible person.

You may not take the initiative in such situations.

If there are individuals in your work environment whom you believe are providing inaccurate information to the media or the public on behalf of SİSTEM ALÜMİNYUM, report the situation immediately to your manager; if you cannot get a response or are hesitant to speak up, report it to the Internal Audit Department.



7

We Respect Patents, Trademarks, and Copyrights

The protection of the Company's intellectual property assets—including patents, trade secrets, copyrights, names and trademarks, scientific and technical information, know-how, and experience or practices acquired during the Company's operations—is critical to safeguarding its competitive advantage.

It is your responsibility as an employee to establish, protect, and defend the Company's intellectual property rights in all matters of commercial importance, and to ensure that these rights are used with due care.

While striving to protect the Company's intellectual property rights, you must also respect the legitimate intellectual property rights of other individuals and organizations.

Unauthorized use of another person's or organization's intellectual property rights may result in the Company facing various lawsuits and claims for damages.

The theft or improper acquisition of goods subject to our company's or other companies' intellectual property rights may result in significant financial penalties and, in some cases, imprisonment for both the company and you.

If you believe that authorized individuals acting on behalf of SİSTEM ALÜMİNYUM are infringing upon the intellectual property rights of other companies or institutions in your work environment, report the situation immediately to your manager; if you do not receive a response or feel uncomfortable speaking up, report it to the Internal Audit Department.



8

We Take Measures Against

Money laundering refers to all activities undertaken by individuals engaged in illegal activities to conceal or legitimize funds obtained through illegal means.

Company employees must protect the Company's reputation by assisting authorities in identifying potential money laundering activities.

Money laundering is often an extremely complex and difficult-to-detect activity.

In particular, SİSTEM ALÜMİNYUM finance department employees must be aware of various indicators pointing to money laundering activities and fulfill their duty to alert management regarding such customers (for example, by issuing warnings not to work with customers who consistently avoid providing complete information about themselves or who always insist on making payments in cash).

SİSTEM ALÜMİNYUM adheres to the principles and guidelines of Know Your Customer (KYC).

If you believe you have encountered certain indicators suggesting money laundering in a particular case, please report the situation immediately to the Internal Audit Department.

For more information on money laundering, please contact the Internal Audit Department.







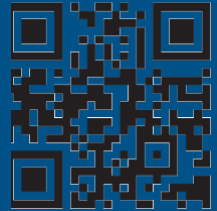
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