SÜTAŞ GROUP CODE OF ETHICS

POLICY AND IMPLEMENTATION GUIDE

TABLE OF CONTENTS

SECTION 1. PURPOSE, SCOPE AND CONTENT 4
1.1. Purpose 4
1.2. Scope 4
1.3. Content 4
SECTION 2. OUR VALUES AND OUR WAY OF DOING BUSINESS 5
2.1. Our Values 5
2.2. Our Way of Doing Business 5
SECTION 3. OUR BUSINESS ETHICS RULES AND IMPLEMENTATION EXAMPLES 8
3.1. Respect for Human Rights 8
3.2. Compliance with Laws and Regulations 8
3.3. Transparency and Accountability 8
3.4. Occupational Health and Safety 9
3.5. Environment and Sustainability 9
3.6. Protection of Corporate Assets and Resources and Prevention of Misuse 9
3.7. Gender Equality and Inclusion 9
3.7.1. Prevention of Discrimination 9
3.7.2. Equality of Opportunity 9
3.7.3. Participatory and Inclusive Culture 10
3.7.4. Prevention of Harassment and Violence 10
3.8. Prevention of Conflicts of Interest 10
3.8.1. Prioritization of Company Interests 10
3.8.2. Financial Relations and Financial Independence 10
3.8.3. Avoiding Personal Gain, Family Ties, and Transparency in Close Relationships 10
3.9. Prevention of Corruption, Bribery, and Money Laundering 10
3.9.1. Refraining from Transactions in Exchange for Benefits 10
3.9.2. Laundering of Assets Derived from Crime (Money Laundering) 10
3.9.3. Compliance with Laws Regarding the Prevention of Corruption, Bribery, and Money Laundering 10
3.9.4. Reporting Suspicious Transactions 10
3.10. Gifts, Hospitality, and Representation 11
3.10.1. Acceptance of Gifts 11
3.10.2. Gift Giving, Hospitality, and Entertainment 11
3.10.3. Samples and Free Products 11
3.10.4. Representation and Participation in Organizations 11
3.11. Commercial Relations and Competition 11
3.11.1. Acting in Compliance with Legislation 11
3.11.2. Information Sharing with Competitors and Limits of Communication 11
3.11.3. Statements and Publications Regarding Competitor Firms 12
3.11.4. External Paid Employment 12
3.11.5. Communication with Family Members and Close Acquaintances Employed at Competitors 12
3.12. Political Activity 12
3.12.1. Participation in Political Activities and Political Propaganda in the Workplace 12
3.12.2. Financial Support and Sponsorships for Political Activities 12
3.13. Ensuring Digital Ethics, Privacy, and Cybersecurity 12
3.13.1. Use of Corporate Systems and Communication Tools 12

3.13.2. Respect for Copyrights and Licensed Use 13
3.13.3. Information Security and Confidentiality 13
3.13.4. Respectful Communication and Protection of Personal Data in Digital Environments 13
3.13.5. Responsible Use of Artificial Intelligence Systems 13
3.14. Protection of Intellectual and Industrial Property Rights 14
3.14.1. Protection of Sütaş Group's Rights, Name, and Reputation 14
3.14.2. Respect for Third-Party Rights 14
3.14.3. Protection Against Counterfeiting and Infringement 14
3.15. Prevention of Retaliation 14
3.15.1. Prevention of Retaliation 14
3.15.2. Witnessing and Protection 14
SECTION 4. ETHICS MANAGEMENT PROCESS 15
4.1. Ethics Management for Sütaş Group 15
4.2. Responsibilities in Ethics Management 15
4.2.1. Responsibilities of Managers 15
4.2.2. Responsibilities of Employees 15
4.3. Reporting Ethical Violations 15
4.3.1. Obligation to Report 15
4.3.2. Reporting Channels 15
4.3.3. Reporting Principles 15
4.3.4. Malicious Reports 16
4.4. Evaluation of Reports and Decision-Making Process 16

SECTION 1. PURPOSE, SCOPE AND CONTENT

1.1. Purpose

The purpose of this policy and implementation guide is to define the Code of Ethics that regulates the relationships and working principles of Sütaş Group employees and all its stakeholders, to determine the framework of the Ethics Management System, and to inform all our relevant stakeholders on this matter.

1.2. Scope

The Code of Ethics covers the companies included in the Sütaş Group, all Board Members of these companies, all employees working in the said companies, suppliers, business partners, and all related third parties.

Unless otherwise stated, the terms “Sütaş Group”, “Sütaş Group Companies”, “our company”, and “we” mentioned in this document represent the Sütaş Group, which incorporates Sütaş Süt Ürünleri A.Ş. (SÜTAŞ), Sütaş Tarımsal Faaliyetler A.Ş. (TARFAŞ), and Sütaş Enerji Faaliyetleri A.Ş. (ENFAŞ) and their operations.

All employees, including Board Members, and all relevant stakeholders are obliged to comply with the Sütaş Group Code of Ethics.

1.3. Content

This policy and implementation guide contain the values, ways of doing business, ethical principles, and the fundamental rules regarding the ethics management process that Sütaş Group must comply with in its business processes.

The rules to be followed by all suppliers, employees of the suppliers, subcontractors, and sub-suppliers who establish a business relationship with Sütaş Group are defined in the “Sütaş Group Supplier Code of Conduct”. The “Sütaş Group Supplier Code of Conduct” has been created in light of the rules within this policy and implementation guide.

SECTION 2. OUR VALUES AND OUR WAY OF DOING BUSINESS

2.1. Our Values

As Sütaş Group, our values determine the fundamental framework of our code of ethics.

- **Respect:** We are respectful to people, society, and nature.
- **Responsibility:** We are always ready to be held accountable, we act fairly and transparently, and we take ownership of our responsibilities.
- **Excellence:** We continuously develop ourselves to be masters and experts in our work, and we strive for excellence.
- **Passion:** We passionately dedicate ourselves to the goodness and abundance of milk, and to the dairy business.

2.2. Our Way of Doing Business

- We prioritize the happiness of our employees and value their development.
    - We believe in creating a fair working environment based on mutual trust.
    - We ensure equal opportunity in recruitment, training, compensation, and career management. We protect the health of our employees and create a safe working environment.
    - We attach importance to the personal and professional development of our employees and support their training.
    - We evaluate our employees based on their skills, competencies, contributions, and experiences; during this process, we are not influenced by differences in language, religion, race, gender, or sect.
    - We believe that a positive working environment based on mutual care and respect increases work efficiency and motivates employees. We do not allow this environment to be disrupted.
- We deliberate when making our decisions, aiming to find the right solutions together and foster collective wisdom.
    - We question how we can do our jobs better and commit fully to the work we perform. We believe that diverse perspectives enrich us during the decision-making process.
    - We believe that while no one can know everything, individuals who are part of a strong team and fulfill their duties properly can achieve great success.
    - We establish communication channels that allow us to gather the thoughts, opinions, and suggestions of our stakeholders, and we encourage their effective use.
    - We learn from our mistakes and utilize them as learning tools.
- We conduct our business under the guidance of science and technology, continuously questioning and learning.
    - We believe that science and technology should be utilized for the benefit of humanity, and under no circumstances do we permit any practice that would compromise the naturalness of our products.

- We continuously improve the quality of our products through our investments in research and development.
- We embrace the dairy culture rooted in Anatolia's millennia-old history, and we strive to deliver these authentic flavors to a wider audience, tailored to modern palates without compromising their naturalness.
- We believe that the dairy business is a craft inherited from our ancestors, and that this craftsmanship must be supported and further developed with expertise under the guidance of science and technology.

- We view our business simultaneously as our social responsibility, and we grow together with all our stakeholders.
  - We are an organization that has made it our mission to spread the goodness and abundance of milk. We carry out all our activities with this sense of duty.
  - We bear the responsibility of being a producer of essential food, which is of utmost importance for the physical and mental development of future generations.
  - We strive to ensure that natural, healthy, and high-quality milk and dairy products reach more people, contributing to the improvement of our society's nutrition and quality of life.
  - In order to deliver the goodness of milk to more people and share its abundance with a wider audience, we manage our entire value chain—extending from forage crop production to milk, and from milk to the table—meticulously and in a mutually supportive manner.
  - We believe that enhancing the welfare of our producers, colleagues, and other stakeholders is essential for the healthy and stable growth of our organization.
  - We carry out all our “From Farm to Table” operations with this understanding of social responsibility.
- We view being creative and innovative as a requisite of our mission and the assurance of our sustainability.
  - We believe that “innovation” is the fundamental driving force that carries organizations forward. Therefore, we value knowledge and learning, and we continuously develop ourselves.
  - We understand the unmet needs of consumers regarding milk and dairy products, develop creative solutions, and offer innovative products.
  - We continuously strive to “improve” the products we manufacture, the processes we manage, and the methods we implement.
  - We believe that sustainable growth is possible through “innovation” and “improvement”.
- We utilize and develop natural resources in the most efficient manner, taking their recyclability and renewability into consideration.
  - We take the long-term impacts and consequences of our decisions into account. We ensure that our business is socially, environmentally, and economically sustainable.
  - We believe that conserving resources and increasing efficiency are prerequisites for an organization to exist in the future. In order to give back to nature what we take from it, we make investments in recycling and renewable energy.

  - We strive to make the most efficient use of our human, natural, and financial resources and to further develop them.
  - We strive to establish a shared understanding regarding conservation, efficiency, and sustainability with all our stakeholders, particularly our employees and suppliers.

- We continuously strive to improve our structure in accordance with corporate governance principles.
  - We comply with laws and regulations.
  - We act fairly and transparently, and we willingly accept accountability.
  - We keep our promises.
  - We do not engage in conduct that would undermine the dignity of individuals, and we protect the confidentiality of personal information.
  - We believe that sharing information increases efficiency, facilitates working life, and brings success.
  - We regularly provide complete, accurate, and clear information regarding our products, activities, and business results.
  - We respond in a timely manner to inquiries from our colleagues, suppliers, and consumers.
  - We do not engage in practices that would lead to unfair competition.
- We adhere to ethical principles.
  - We comply with laws and company procedures.
  - We do not allow our personal interests to take precedence over the interests of our organization.
  - We protect company assets and utilize them in the most efficient and effective manner.
  - We establish relationships with our colleagues based on mutual care, respect, honesty, and trust.
  - We establish communication with the individuals and organizations we interact with based on respect, honesty, and trust.

SECTION 3. OUR BUSINESS ETHICS RULES AND IMPLEMENTATION EXAMPLES

3.1. Respect for Human Rights

Wherever we operate within the Sütaş Group, we unconditionally respect the fundamental rights and freedoms of all employees; we base our practices on the Universal Declaration of Human Rights adopted by the United Nations and the Declaration on Fundamental Principles and Rights at Work published by the International Labour Organization (ILO). Our expectations regarding human rights also apply to the suppliers and business partners with whom we have business relationships. Detailed rules and expectations regarding this matter are defined in the Sütaş Group Supplier Code of Conduct. In this context;

- We do not allow forced labor, coercion, threats, debt bondage, or any practice that restricts the free will of employees.
- We do not tolerate human trafficking, modern slavery, or similar human rights violations under any circumstances.
- We do not permit child labor; we comply with legal regulations and protection principles in the employment of young workers. We do not establish business relationships with any stakeholder that employs child labor.
- We provide a safe and respectful working environment befitting human dignity, where employees are not subjected to physical, psychological, sexual, or verbal harassment.
- We do not discriminate in recruitment, compensation, promotion, or any other employment processes.
- We comply with applicable legislation and the principles of fair working conditions in all aspects of employment, including working hours, wages, and benefits.
- We ensure that employees are able to make decisions to commence employment, continue working, and terminate employment of their own free will.

3.2. Compliance with Laws and Regulations

- We embrace the rule of law, comply with the legislation and regulations in force in the countries where we operate, and conduct all our activities within this framework.
- We expect our stakeholders to comply with the law and relevant regulations as well.
- We adhere to the regulations, procedures, instructions, and job descriptions established for the operations of Sütaş Group.
- We protect the interests and reputation of Sütaş Group, and we observe the rights of our stakeholders within the framework of business ethics rules.

3.3. Transparency and Accountability

As Sütaş Group, we conduct all our activities in line with the principles of integrity, openness, and responsibility. We are accountable for our decisions, actions, and the authority we exercise; we create and maintain information and records regarding our business processes accurately, completely, and in a timely manner. In this context;

- We do not create any information, document, or record that does not reflect the truth.
- We maintain records related to our business processes completely, accurately, in a timely manner, and in compliance with applicable legislation.
- We exercise our authority and responsibilities carefully and take ownership of the consequences of the decisions we make.
- We conduct our business-related expenditures and transactions in a transparent, documentable, and auditable manner.
- We do not falsify or tamper with any record or document, make misleading statements, nor do we permit such actions.
- We make it a principle to ensure that the information we present to our stakeholders and consumers is shared accurately, completely, and in a non-misleading manner. We provide timely and accurate responses to requests and inquiries from our stakeholders.
- We act objectively, transparently, and in accordance with predetermined criteria in the selection of suppliers and business partners.

3.4. Occupational Health and Safety

- Wherever we operate, we comply with the legislation, procedures, rules, and instructions regarding occupational health and safety; we avoid behaviors that could put ourselves or others at risk.
- We comply with applicable emergency procedures in situations such as fire, flash fire, explosion, occupational accidents, earthquakes, floods, adverse weather conditions, chemical spills, sabotage, terrorism, and bioterrorism.
- We do not possess or use drugs, addictive substances, or substances that impair mental or physical abilities in the workplace, nor do we enter the workplace under the influence of such substances. We do not perform any business activities while under the influence of these substances. We do not consume alcohol in the workplace, nor do we remain in the workplace under the influence of alcohol. We do not use tobacco products, e-cigarettes, and similar items outside of designated areas in the workplace.
- We do not possess items or substances in the workplace that could pose a danger or are of an illegal nature.

3.5. Environment and Sustainability

- We operate with the mission of managing and developing entrusted resources in the most efficient manner, and we aim to minimize the adverse environmental impacts of our operations.
- Through our "From Farm to Table" business model based on the principle of circularity, we utilize resources efficiently, minimize waste generation, and protect the soil, water, and air.
- In our operations, we comply with the applicable environmental legislation; going beyond compliance, we aim to establish high environmentally conscious standards. We expect our stakeholders to act accordingly.

3.6. Protection of Corporate Assets and Resources and Prevention of Misuse

All assets belonging to the Sütaş Group are to be used efficiently and responsibly, solely for business purposes. Safeguarding these assets and preventing loss, damage, misuse, and waste is the responsibility of all employees. Exceptional circumstances explicitly defined in employment contracts are excluded from this scope. In this context;

- We do not use company assets (machinery, equipment, vehicles, hardware, software, inventories, and similar items) for personal gain or the benefit of third parties.
- We utilize corporate resources (time, budget, systems, and workforce) solely for business purposes and in an efficient manner.
- We protect assets against loss, damage, theft, misuse, and waste.
- We do not permit the unauthorized use, transfer, or disposal of company assets.
- Except in cases of necessity, we do not allocate time to personal matters during working hours.
- We do not exercise any right of disposition over any asset that falls outside our authorization.
- We comply with the relevant procedures and approval mechanisms in all processes related to the use of assets.

3.7. Gender Equality and Inclusion

3.7.1. Prevention of Discrimination

- Within the Sütaş Group, no discrimination is tolerated on the grounds of gender, age, ethnic origin, religion, language, race, political opinion, disability, sexual orientation, or similar reasons.
- All employees are obligated to refrain from using discriminatory and/or exclusionary language and behavior in their business relationships and communications.
- Religious or political views are considered to fall within the personal sphere. It is unacceptable to propagate these views in the work environment, use them as a means of pressure on employees, or allow them to influence decision-making processes.

3.7.2. Equality of Opportunity

- In order to foster an inclusive corporate culture, we adhere to the principle of equal opportunity in all human resources processes, including recruitment, training, promotion, compensation, and task allocation.

3.7.3. Participatory and Inclusive Culture

- In the work environment, we foster a participatory culture where everyone can freely express their opinions regarding the work being done.
- We make it a principle to create an inclusive work environment where every individual is respected and feels safe and equal.

3.7.4. Prevention of Harassment and Violence

- Employees are strictly obligated to refrain from any conduct that constitutes verbal, physical, sexual, or psychological harassment (mobbing) in the work environment.
- We avoid any attitudes and behaviors in the workplace that are intimidating, hostile, aggressive, humiliating, or degrading.
- Our employees refrain from any violent behavior towards other employees, stakeholders, family members, society, and other living beings; they base all their relationships on respect and courtesy.

3.8. Prevention of Conflicts of Interest

3.8.1. Prioritization of Company Interests

- We do not allow our personal interests to take precedence over the interests of the Sütaş Group. We do not derive direct or indirect personal benefits from procurement, sales, or contracting processes conducted on behalf of the Sütaş Group.

3.8.2. Financial Relations and Financial Independence

- We do not enter into personal financial relationships, including debtor/creditor relationships, with individuals and organizations with which the Sütaş Group has business relationships.

3.8.3. Avoiding Personal Gain, Family Ties, and Transparency in Close Relationships

- We do not secure any benefits for ourselves, our family members, or our relatives from individuals and organizations with which we have business relationships by taking advantage of our duties. We do not engage in supplier and/or customer relationships with our family members. We promptly report our family members and relatives working in our organization, our customers, our suppliers, or competitor firms to the Business Ethics Committee. In exceptional cases, we obtain the approval of our manager and the Business Ethics Committee.

3.9. Prevention of Corruption, Bribery, and Money Laundering

3.9.1. Refraining from Transactions in Exchange for Benefits

- Even if it is in favor of the Sütaş Group, our employees cannot engage in any actions that may be considered bribery or corruption, directly or indirectly, in order to obtain benefits from any individual or organization.

3.9.2. Laundering of Assets Derived from Crime (Money Laundering)

- No employee may participate, directly or indirectly, in transactions aimed at concealing, legitimizing, or introducing proceeds of crime into the financial system. Financial transactions that are of unknown origin, suspicious, or unusual are not accepted.

3.9.3. Compliance with Laws Regarding the Prevention of Corruption, Bribery, and Money Laundering

- We fully comply with the applicable legislation, including all national and international regulations regarding the fight against corruption and bribery.

3.9.4. Reporting Suspicious Transactions

- We carefully monitor unusual and suspicious transactions in our relationships with customers, suppliers, and other business partners, and promptly report suspicious requests and transactions to the Senior Line Manager and the Business Ethics Committee.

3.10. Gifts, Hospitality, and Representation

3.10.1. Acceptance of Gifts

- We do not accept gifts that could influence our impartiality, decisions, and behavior. Gifts exceeding the specified monetary limit are unacceptable. Monetary limits are reviewed annually, determined by Human Resources, and communicated to employees. We do not accept cash or gifts equivalent to cash, regardless of their amount.

3.10.2. Gift Giving, Hospitality, and Entertainment

- Except for promotional gifts or gifts for special occasions of the Sütaş Group, we do not give gifts to individuals or institutions with which we have business relationships. Within the scope of business and commercial relations, we do not offer gifts or hospitality that could influence the decisions or business practices of the other party.
- Any gifts, hospitality, donations, sponsorship, or product deliveries to public officials or public institutions must be in full compliance with the relevant legislation, ethical principles, and the Sütaş Group's internal approval procedures.
- Hospitality and entertainment practices carried out within the scope of business relations must be proportionate, transparent, recorded, and limited to the requirements of the business.

3.10.3. Samples and Free Products

- Free products and samples provided for promotion, testing, quality assessment, or sales support purposes within the scope of our commercial relations are given solely within the framework of procedures approved by the Sütaş Group and in compliance with the relevant legislation.
    - We do not permit practices in sample and free product processes that would compromise impartiality or create a perception of benefit on the part of the relevant party.
    - We base all transactions on clear, documentable justifications aligned with their purpose.
    - We record the type, quantity, and purpose of the products or samples provided, and audit our processes periodically.
    - We ensure that all deliveries made to public officials or public institutions are carried out in full compliance with relevant legal regulations and ethical principles.

3.10.4. Representation and Participation in Organizations

- We participate in seminars, trainings, social events, and similar organizations to which we are invited to represent the Sütaş Group, subject to the approval of the Senior Line Manager and, where necessary, Corporate Communications.
- We do not use Sütaş Group letterheads or e-mail accounts to express personal opinions or for personal affairs; we do not make statements on behalf of Sütaş Group companies unless authorized.
- Before giving statements or conducting interviews with any media outlet, or taking part as a speaker in environments such as seminars and conferences, we obtain the approval of our Senior Line Manager and Corporate Communications.
- In these activities, we represent the Sütaş Group accurately, share only publicly available information, and do not derive personal gain.
- When expressing our personal opinions, we exercise the necessary diligence to ensure that these views are not perceived as the official stance of the Sütaş Group.

3.11. Commercial Relations and Competition

3.11.1. Acting in Compliance with Legislation

- Our fundamental principle is to ensure full compliance with the applicable legislation regarding Competition Law and our Sütaş Group Competition Law Handbook published for all our employees accordingly, and to conduct our processes in accordance with the legislation. We do not engage in any attitudes or behaviors that may lead to unfair competition, restrict, or distort competition.

3.11.2. Information Sharing with Competitors and Limits of Communication

- It is strictly prohibited to unlawfully obtain, use, store, or share non-public information regarding competitor firms. We cannot engage in the exchange of competitively sensitive information, such as prices, costs, discount rates, customer information, market strategies, or similar data, with competitor firms.
- In cases where communication with competitor employees is required due to our duties, we conduct such meetings with the knowledge and prior approval of our relevant Senior Line Manager. Contacts with competitor firms are kept strictly limited to legitimate business purposes, and no competitively sensitive information may be shared.

3.11.3. Statements and Publications Regarding Competitor Firms

- We do not make derogatory, misleading, untrue, or defamatory statements and shares regarding competitor firms and their products and services on any medium, including social media. We do not create or share content that is defamatory toward other companies.

3.11.4. External Paid Employment

- Regardless of the title or nature of the work, without the prior written consent of the employer, we do not engage in paid or unpaid work on behalf of any other individual or organization, during or outside working hours; nor do we engage in commercial activities, directly or indirectly. Where deemed necessary, internal approval mechanisms are executed for such activities. It is essential that any activities conducted outside working hours do not compete with Sütaş Group, create a conflict of interest, adversely affect job performance, or damage the company's reputation.

3.11.5. Communication with Family Members and Close Acquaintances Employed at Competitors

- In our communications with family members or close acquaintances employed at competitor companies, we strictly refrain from sharing any non-public, commercially confidential, or competition-sensitive information of Sütaş Group, or engaging in any disclosure that would violate competition law regulations.

3.12. Political Activity

3.12.1. Participation in Political Activities and Political Propaganda in the Workplace

- As Sütaş Group, we do not provide corporate support or make donations to any political party, politician, or similar organizations.
- Political activities are not permitted within workplace premises.
- As Sütaş Group, we do not direct or encourage our employees to disclose their political views, join a specific political party, or provide political support.
- We uphold the principles of neutrality and individual freedom in these matters.
- Accordingly, our employees are free to participate in political activities within the scope of their individual rights and legal boundaries.
- However, during such activities, employees are expected to refrain from statements, symbols, behaviors, and/or visual materials that represent Sütaş Group or create the impression of representing the organization.

3.12.2. Financial Support and Sponsorships for Political Activities

- Sütaş Group resources may not be used, directly or indirectly, for donations, support, or lobbying activities for any political party, candidate, or political organization.

3.13. Ensuring Digital Ethics, Privacy, and Cybersecurity

3.13.1. Use of Corporate Systems and Communication Tools

- Corporate communication tools—such as corporate email addresses, telephones, and internet access provided by Sütaş Group to fulfill our duties—are primarily intended for business purposes. Provided that they do not disrupt business responsibilities or conflict with the organization's interests, these tools may be used for personal needs only to a strictly necessary and limited extent.
- We maintain the confidentiality of the usernames and passwords assigned to us. We do not permit others to use our passwords or log in to systems on our behalf. We never share application or account credentials with

third parties; we ensure that access to systems is restricted strictly to authorized users, and that all access is properly logged.

- We refrain from sending or forwarding chain emails, spam messages, and similar unsolicited communications, and report them to the Information Security teams whenever received.

3.13.2. Respect for Copyrights and Licensed Use

- When sharing, uploading, accessing, or disseminating any content via corporate email accounts, information and communication technologies, information systems, or social media platforms, we ensure that such materials do not constitute copyrighted articles, artworks, films, photographs, music, presentations, data, or similar intellectual property. Unauthorized use of such content violates copyright laws, ethical standards, and legal regulations.
- Software, technology, patents, and designs may only be utilized within the scope of their respective license agreements. Unauthorized copying and distribution are strictly prohibited.

3.13.3. Information Security and Confidentiality

- We use non-public information belonging to Sütaş Group that we acquire in the course of our duties solely within our authorization, and we never share it with unauthorized individuals. This obligation remains in effect both during and after the termination of the employment relationship.
- Commercially confidential information and trade secrets (such as product formulas, manufacturing processes, pricing strategies, source code, etc.) are disclosed only to authorized personnel and strictly on a need-to-know basis.
- Salary, fringe benefits, and any supplementary income constitute personal confidential data; sharing such information or attempting to access the data of others is unethical and undermines the internal environment of trust.
- When disclosing institutional information at seminars, trade fairs, conferences, and similar venues, we act in strict compliance with our confidentiality, patent, and trade secret policies.
- We do not share information or data belonging to Sütaş Group on social media or in public domains; workplace matters and concerns are communicated exclusively through the appropriate internal channels.
- Personal data collected within our business processes are processed strictly in accordance with applicable legislation and corporate data protection policies.
- In all communication and data processing activities carried out with stakeholders, necessary authorizations and explicit consents are duly obtained.
- Upon termination of employment, we return all data, documents, and digital assets belonging to Sütaş Group completely and without omission; we strictly refrain from using or sharing this information post-employment.

3.13.4. Respectful Communication and Protection of Personal Data in Digital Environments

- On digital platforms, we maintain a respectful, constructive, professional, and courteous tone toward all stakeholders, strictly refraining from discriminatory, threatening, insulting, or derogatory expressions.
- We refrain from posting or disseminating messages that could harm Sütaş Group, its reputation, products, or services; reflect personal employee opinions; endorse a third-party company/initiative; or constitute commentary, blog posts, social media updates, and similar statements regarding Sütaş Group made without the explicit authorization of the Business Unit Top Management.
- We avoid accessing websites and content that support illegal activities, gambling, or sexually explicit material, as well as content that is discriminatory, threatening, insulting, derogatory, defamatory, or degrading on the basis of gender, age, race, nationality, religious beliefs, or political views.
- On social media platforms, we refrain from making derogatory, misleading, untrue, or defamatory statements and posts concerning competitor companies and their products or services. Furthermore, we express our personal views with due regard to the distinction between speaking on behalf of the company and speaking about the company, ensuring that our personal opinions are not perceived as corporate stances.

3.13.5. Responsible Use of Artificial Intelligence Systems

- AI-based applications are utilized solely for business purposes and in strict accordance with applicable company policies and procedures.
- Commercially confidential information, trade secrets, personal data, customer records, financial data, or confidential corporate information must not be uploaded to publicly accessible artificial intelligence systems.

- Content, analyses, and recommendations generated by AI tools must not be relied upon as the sole basis for decision-making processes without proper verification.
- Principles of information security, confidentiality, intellectual property, and ethics are strictly observed in the use of artificial intelligence.
- It is essential that content generated using artificial intelligence is disclosed transparently to relevant parties whenever appropriate or required.

3.14. Protection of Intellectual and Industrial Property Rights

3.14.1. Protection of Sütaş Group's Rights, Name, and Reputation

- Inventions, designs, software, and content developed by employees during the course of their duties belong to Sütaş Group and may not be used for personal purposes, shared, or exploited for commercial gain.
- In research, publications, and presentations carried out by Sütaş Group employees, the intellectual property rights of Sütaş Group are protected, and sources are accurately cited. Furthermore, intellectual property rights contributed to by employees belong to Sütaş Group; however, employee contributions are documented and recognized transparently.
- In joint projects and collaborations conducted with universities, research centers, or other companies, the allocation and management of intellectual property rights are explicitly established through binding agreements.
- We do not use the name, title, reputation, resources, or authorized powers of Sütaş Group for personal gain.
- It is essential that Sütaş Group's trademarks, logos, and corporate identity elements are used strictly within authorized processes.

3.14.2. Respect for Third-Party Rights

- It is essential to strictly refrain from any conduct that may infringe upon the intellectual and industrial property rights of competitor companies, collaborating suppliers, business partners, or other third parties.

3.14.3. Protection Against Counterfeiting and Infringement

- Corporate interests are protected against the unauthorized use of our brands, products, or software by third parties; any detected occurrences must be reported promptly and without delay to the Business Ethics Committee or the Legal Affairs Directorate.

3.15. Prevention of Retaliation

3.15.1. Prevention of Retaliation

- Retaliation against any individual who submits an ethics report or whistleblower notification is strictly prohibited within Sütaş Group; such actions are evaluated and addressed under disciplinary procedures.
- Retaliation includes, but is not limited to, mobbing, harassment, discrimination, threats, ostracization, direct or indirect career restrictions, involuntary reassignment, unjust negative performance appraisals, heightened surveillance, and similar adverse actions directed at the reporting individual.

3.15.2. Witnessing and Protection

- Any employee or individual who reports a violation of ethical principles and believes or witnesses that retaliation is being directed against themselves or another employee may promptly report the matter to their senior manager, the Human Resources team, or directly to the Business Ethics Committee.

SECTION 4. ETHICS MANAGEMENT PROCESS

4.1. Ethics Management for Sütaş Group

Sütaş Group Ethics Management refers to the integrated framework of principles, values, rules, and practices ensuring that Sütaş Group and its stakeholders prioritize doing what is right across all operations, while safeguarding the welfare of both individuals and society.

4.2. Responsibilities in Ethics Management

4.2.1. Responsibilities of Managers

All employees serving in managerial positions within Sütaş Group are obligated to fulfill the following responsibilities under Ethics Management and Practices.

Managers;

- Ensure that ethical rules are thoroughly understood and implemented.
- Foster an environment where employees can freely express their views without fear of retaliation.
- Collaborate with the Business Ethics Committee whenever necessary.

4.2.2. Responsibilities of Employees

All employees are obligated to comply with the Sütaş Group Code of Ethics and conduct themselves in alignment with ethical values.

Employees;

- Apply ethical rules as an integral part of their daily business processes.
- Report potential or actual ethical violations without delay.
- Utilize advisory mechanisms whenever in doubt regarding ethical matters
- Contribute to strengthening the ethical culture and collaborate in ongoing processes
- When uncertain whether a situation is ethically sound, consult their managers, Human Resources, or the Business Ethics Committee. Inquiries made in good faith to determine the ethically correct course of action are strongly encouraged.

4.3. Reporting Ethical Violations

4.3.1. Obligation to Report

- Sütaş Group provides transparent, secure, and accessible reporting mechanisms for the early detection and prevention of ethical violations.
- All employees are obligated to report immediately whenever they encounter or witness a situation contrary to the Business Ethics Rules.

4.3.2. Reporting Channels

Reports may be submitted through the following channels.

- Via the website www.etiksutas.com, operated by an independent third party
- By telephone at +90 224 688 52 00
- In writing addressed to "Attention: Sütaş Ethics Committee" at P.O. Box 68, 16159 Organize Sanayi P.T.T. BURSA.

4.3.3. Reporting Principles

Reports may be submitted confidentially with identity disclosed or anonymously.

- Reports must be clear, comprehensible, and supported by concrete information to the extent possible.
- The time, location, and parties involved in the incident should be specified where possible.
- Supporting information and documentation, if available, should be attached.
- The identities of individuals submitting reports are kept strictly confidential.
- Reporting and investigation processes are conducted in accordance with the principles of confidentiality, neutrality, and objectivity
- Retaliation against individuals who make reports in good faith is strictly prohibited.

4.3.4. Malicious Reports

- Intentionally false, misleading, and/or defamatory reports are considered a violation of ethical rules.
- Any company or employee suffering damages as a result of a false report reserves the right to pursue legal remedies against the reporting party under the provisions of the Turkish Penal Code, the Labor Law, and other relevant legislation.

4.4. Evaluation of Reports and Decision-Making Process

Ethics violation reports are evaluated by the Business Ethics Committee within the framework of the following principles.

- Reports are examined in strict compliance with the principles of confidentiality, neutrality, and independence.
- Support may be obtained from relevant business units, internal audit, or independent external experts whenever deemed necessary.
- Decisions made as an outcome of the investigation process are executed in accordance with relevant policies and disciplinary procedures.
- Upon completion of the evaluation process, feedback is provided to the reporting individual, where deemed appropriate.

