



**CODE OF BUSINESS ETHICS REGULATION ON THE PRINCIPLES OF COMBATING  
BRIBERY AND CORRUPTION**

**METGÜN-EZE-ATİS/UYM/YÖN-01**

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### INTRODUCTION

Metgün-Eze-Atis Ordinary Partnership is a construction company operating in a complex, competitive and volatile environment with various risks. In this context, it is vital for the Metgün-Eze-Atis Ordinary Partnership to maintain its good reputation and be recognized as a reliable business partner both locally and internationally. In order to achieve these goals, the Company strives to minimize risks in a reasonable manner by implementing corporate policies and regulations. These Code of Business Ethics Regulation on the Principles of Combating Bribery and Corruption (Business Ethics Rules or Rules) are designed to protect and enhance the company's reliability, operations, and reputation, and set out the minimum requirements for avoiding and minimizing risks on behalf of employees and business partners and protecting the specified important values.

Wherever the Company operates, it is of utmost importance for every employee of Metgun-Eze-Atis Ordinary Partnership, including the Board of Directors and senior management, to understand and apply the essence of this Code of Business Ethics. The absence of any situation or example in the Code of Business Ethics should not imply that there is no risk in this regard. The Code of Business Ethics may not be able to respond to all risks encountered in operations, but it is intended to be a reliable source for acting ethically, responsibly and within the legal boundaries of the relevant regions where the company does and will do business

### 1. PURPOSE OF THE CODE OF BUSINESS ETHICS and REGULATION ON THE PRINCIPLES OF COMBATING BRIBERY and CORRUPTION

The Codes of Business Ethics Regulation on the Principles of Combating Bribery and Corruption reflect Metgün-Eze-Atis Ordinary Partnership's commitment to ethical business practices and its expectations from its employees and business partners regarding ethical rules. These rules bind the Ordinary Partnership, its branches and subsidiaries, senior executives, board members, employees, contractors, subcontractors and suppliers, business partners, agents, lobbyists and anyone else acting on behalf of the Metgün-Eze-Atis Ordinary Partnership. Regardless of the size and location of the work performed, Metgün-Eze-Atis Ordinary Partnership's commitment to these rules is in line with all laws and regulations, without violating universal human rights and ethical values.

The main principles covered by the Code of Business Ethics are described below. It is important that these principles described below within the scope of business ethics are not perceived as restrictive. Although not mentioned here, there may be situations that pose risks and these situations are managed within the framework of the Code of Business Ethics.



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## 2. SCOPE OF THE CODE OF BUSINESS ETHICS

### 2.1. INDIVIDUAL CODE OF ETHICS

Metgun-Eze-Atis Ordinary Partnership has set high ethical standards for everyone working on behalf of the Company. Individuals must adhere to laws and regulations and comply with the requirements and standards set by Metgun-Eze-Atis Ordinary Partnership in the performance of their duties.

Metgün-Eze-Atis Ordinary Partnership expects its employees to show courtesy and respect during their work. Every employee must avoid negative behavior that could affect the work environment, other employees, or the Company. This includes any form of discrimination, harassment or any behavior that may make employees feel undervalued, threatened or unwell. Employees, agents and representatives of Metgun-Eze-Atis Ordinary Partnership must respect the cultural and traditional requirements of their environment.

### 2.2. EQUALITY and DIVERSITY

Metgün-Eze-Atis Ordinary Partnership does not allow any of its employees to be subjected to sexual, physical, psychological harassment, pressure or bullying. Harassment is a form of unwanted and unrequited behavior that disturbs, humiliates and hurts the employee in the workplace. Harassment can occur between an employee and his or her manager, coworkers, or between the employee and anyone else in the workplace. If it is not reciprocated and is not welcomed, the examples given below may constitute harassment:

- Physical contact or sexual demands
- Persistent stalking
- Persistent glances with sexual innuendo
- Persistent verbal abuse or threats
- Persistently interfering with an individual's work, workspace, belongings or personal materials.
- Insulting or humiliating jokes, comments
- Humiliating or demeaning gestures and hand gestures
- Circulation and display of defamatory visual or written materials in the workplace.

Having employees with diverse backgrounds, education, and personal development is an important asset of **Metgün-Eze-Atis Ordinary Partnership**. Metgün-Eze-Atis Ordinary Partnership is committed to providing equal employment opportunities to all qualified employees and candidates.



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Metgün-Eze-Atis Ordinary Partnership employees must comply with all laws and regulations prohibiting discrimination based on age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual orientation, political or philosophical opinion, trade union membership.

If an employee experiences or observes any form of abuse, he/she may report it to the Human Resources Department. The Company undertakes not to take any negative action against the employee who reports in good faith.

The recruitment process is evaluated entirely within the framework of the candidate's qualifications and characteristics. Wages are determined according to the Company's relevant policies and standards as well as the employee's contribution to the Company.

Metgün-Eze-Atis Ordinary Partnership respects all individuals without discrimination and actively strives to provide a positive working environment based on equality and diversity.

### 2.3. SUSTAINABILITY

Metgün-Eze-Atis Ordinary Partnership operates under the philosophy that "Sustainable development is only possible with a sustainable environment," minimizing the environmental impact of its activities and projects and aiming to ensure sustainable and innovative development in all areas related to the environment. It establishes efficient facilities with effective waste management and aims to minimize the consumption of natural resources. In the projects in which we operate, we adopt a management approach that complies with legal regulations on the environment. We carry out sustainability studies to ensure the balance between economic growth and environmental factors and adapts effectively to these studies.

### 2.4. CONFLICTS OF INTEREST

Employees of Metgün-Eze-Atis Ordinary Partnership must always be loyal to the Company and act with integrity in their business dealings. Employees must not provide any advantage to other companies, organizations or individuals that could be used against the Company. In the performance of their duties, employees of Metgün-Eze-Atis Ordinary Partnership shall avoid all relationships that may create or be perceived as a conflict of interest and that may adversely affect their judgment or freedom of action.

An employee of Metgün-Eze-Atis Ordinary Partnership must not work with or be a client of a spouse, partner, first-degree relatives such as biological or adopted children, grandchildren, parents, grandparents, siblings or children of siblings, household members or anyone else close to him/her who, directly or indirectly, has a financial interest in the work performed, without first informing the Company through the Compliance Officer or his/her managers. They must not engage in any activities or agreements that may undermine the integrity and



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trust of the business, and must not take part in the board of directors or work as a manager in companies that are competitors of Metgün-Eze-Atis Ordinary Partnership. Any person who lives with the employee or has economic ties with the employee is considered a family member.

Employees may not use Metgün-Eze-Atis Ordinary Partnership assets or information obtained through their positions for personal gain or to compete with Metgün-Eze-Atis Ordinary Partnership. Any situation that may cause a conflict of interest should be reported to senior management.

In the event that people working on behalf of Metgün-Eze-Atis Ordinary Partnership are employed by other companies that compete with Metgün-Eze-Atis Ordinary Partnership, this situation must be notified in writing to the management of Metgün-Eze-Atis Ordinary Partnership without delay and written approval must be obtained.

### 2.5. RESPECT FOR LAWS and REGULATIONS

The reputation of the Metgun-Eze-Atis Ordinary Partnership is based on its respect for all laws and practices in the countries in which it operates. It is the responsibility of the company and its employees to be aware of the laws and practices in the countries in which it operates. Every employee should be aware that violations of law and practice may result in disciplinary action, as well as civil and criminal prosecution.

Metgün-Eze-Atis Ordinary Partnership expects compliance with ethical standards that go beyond local laws and practices in order to achieve high ethical goals. In addition, Metgün-Eze-Atis Ordinary Partnership is committed to human rights and labor laws, health and safety standards, environmental protection, anti-corruption, fair competition, taxation practices and accounting standards. We also comply with the principles of the United Nations Declaration of Human Rights, the Organization for Economic Cooperation and Development (OECD) and the International Chamber of Commerce (ICC).

### 2.6. CONFIDENTIALITY

Confidential information includes, but is not limited to, intellectual property rights and all kinds of innovations belonging to the Company, as well as databases, printed communication materials, business processes and business plans, business strategies, information on strategic partnerships and partners, financial information, personnel personal information, customer lists, price, design, method information (know-how), specifications, information on potential and customers and all similar information.

Information is one of the most important assets that the Company will use to realize its goals. In this direction, it is the shared responsibility of employees to use information



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effectively, to share it correctly and to ensure the confidentiality, integrity and accessibility of information in this process.

Employees of Metgün-Eze-Atis Ordinary Partnership should be aware of which information is commercially sensitive, should not share this information with any competitor within the scope of competition laws, and should show the utmost interest and attention to these matters in work-related environments. As these laws are complex and vary from country to country, Metgün-Eze-Atis Ordinary Partnership employees must consult the Compliance Officer or Legal Department when faced with a dilemma.

Employees may not share confidential and non-public information about the company with unauthorized people for any purpose whatsoever. in line with the “clean desk-clean screen” principle, it is important that confidential documents are not left open on desks, passwords are carefully kept, and confidential information is not discussed in common areas.

### 2.7. HEALTH, SAFETY, ENVIRONMENT and WORK ENVIRONMENT

Metgün-Eze-Atis Ordinary Partnership provides a safe and healthy working environment in all its operations and strives to implement this in every project in which it operates. These standards are set out in the Occupational Health, Safety, Environment (HSE) principles and all staff, subcontractors and suppliers are expected to comply. To reduce the number of accidents to zero, special attention needs to be paid to high-risk activities. This approach is supported by intensive training for managers and employees and by showing zero tolerance for deviations from these standards.

Metgün-Eze-Atis Ordinary Partnership aims to reduce, minimize or avoid the environmental impact of its activities by demonstrating its commitment to applicable environmental laws and regulations wherever it operates. In this respect, Metgün-Eze-Atis Ordinary Partnership follows the relevant local and international laws, regulations and conventions. This commitment also applies to subcontractors, suppliers and business partners of Metgün-Eze-Atis Ordinary Partnership.

As Metgün-Eze-Atis Ordinary Partnership, our primary objective in Health, Safety, Environment (HSE) is to prevent accidents and damages to people or property and to prevent damage to the environment. In order to maintain high safety standards, Metgün-Eze-Atis Ordinary Partnership expects all employees to take responsibility for their own safety in and around the workplace.

Metgün-Eze-Atis Ordinary Partnership aims to minimize the environmental impact of its activities by taking preventive and sustainable measures to protect the environment. Employees must be familiar with all environmental regulations and ensure that their work complies with current standards. They must promptly report any situations that could harm the environment to the relevant advisor or manager, aim to minimize the environmental



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impact of activities within their area of responsibility, and use Company resources efficiently and sustainably.

### 2.8. PROHIBITED SUBSTANCES

Employees are prohibited from being under the influence of any stimulant, including alcohol, while working for the Company. No one should use or encourage others to use stimulants or alcohol in violation of the rules.

### 2.9. PRIVACY and CONFIDENTIALITY of PERSONAL INFORMATION

Metgün-Eze-Atis Ordinary Partnership undertakes to respect the confidentiality and privacy of personal information. Personal information is requested and stored only for the effective operation of the Company or as required by law. In accordance with this principle, Metgün-Eze-Atis Ordinary Partnership respects the individual's right to privacy and does not concern itself with the individual's life outside of work, provided that it does not negatively affect their work performance or impact the Company's reputation and commercial interests. The following basic rules must be followed by all employees or anyone acting on behalf of Metgun-Eze-Atis Ordinary Partnership:

- Metgün-Eze-Atis Ordinary Partnership requires its employees, subcontractors and suppliers, business partners, intermediaries, customers and anyone acting with Metgün-Eze-Atis Ordinary Partnership to comply with Metgün-Eze-Atis Ordinary Partnership's information security policy.
- Confidentiality of personal information is ensured and access to this information is restricted to authorized people who need it.
- Personal information is only used for specific purposes in a fair and honest manner.
- Personal information collected to fulfill legal, regulatory or business needs cannot be kept longer than necessary.
- When transferring personal information abroad, privacy laws are understood and, if necessary, advice is sought on this matter.
- Care should be taken when using electronic media. Information created and stored on computers or other electronic devices may not always be secure or confidential. In addition, due to laws and regulations, this information may be accessed, monitored and reviewed without prior notice.



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- Employees shall not attempt to obtain personal information without a valid reason and access permission, nor shall they disclose personal data to anyone inside or outside the Company without being certain of its appropriateness.

### 2.10. ANTI-MONOPOLY

One of the basic needs of the international economy is competition. Metgün-Eze-Atis Ordinary Partnership believes that companies should be able to compete fairly in the international market.

Metgün-Eze-Atis Ordinary Partnership is aware that violations of competition laws may result in severe penalties and that its employees may be subject to trade, civil, public and criminal penalties and, in some cases, even imprisonment. In addition, there is a high risk that third parties may seek compensation from the Company as a result of violations of these rules. Therefore, every employee of Metgun-Eze-Atis Ordinary Partnership must understand and comply with these laws. Employees of Metgun-Eze-Atis Ordinary Partnership must not participate in agreements with competitors that have the purpose of influencing the bidding process, sharing markets or customers, or boycotting a customer or supplier.

Metgün-Eze-Atis Ordinary Partnership is always committed to the principles of fair competition in its activities. Employees of Metgün-Eze-Atis Ordinary Partnership must not engage in anti-competitive activities, including in countries where such activities are legal or where competition laws are underdeveloped.

### 2.11. TRADE RESTRICTIONS and EXPORT BOYCOTTS

Due to its business objectives and interests, Metgün-Eze-Atis Ordinary Partnership operates in many different fields and markets. From time to time, service, goods, software, or technology embargoes or any other trade restrictions may be imposed on these regions due to certain local or international laws. Metgün-Eze-Atis Ordinary Partnership complies with boycotts and embargoes imposed by relevant authorities and organizations, provided that they do not conflict with the laws of the Republic of Türkiye. Any employee of Metgün-Eze-Atis Ordinary Partnership who encounters a legal issue or dilemma must consult the Compliance Officer or Legal Department regarding the matter.

### 2.12. BUSINESS PARTNERS, SUPPLIERS, and CONTRACTORS

Business partners, suppliers and subcontractors are expected to comply with the principles of Metgün-Eze-Atis Ordinary Partnership. This expectation is met by adding relevant clauses



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to the agreements made and thereby establishing mutual commitments between the parties involved.

Metgün-Eze-Atis Ordinary Partnership prioritizes compliance with ethical principles when selecting business partners, suppliers, and subcontractors. It avoids any kind of gift, hospitality or any other favoritism that may distort fairness in the selection of suppliers, only works with suppliers, business partners and subcontractors who undertake to comply with the principles written here and ensures that this commitment is documented in writing. It also periodically assesses the merit of suppliers, subcontractors, partners and intermediaries acting on behalf of Metgün-Eze-Atis Ordinary Partnership.

Employees of Metgün-Eze-Atis Ordinary Partnership, or parties acting on behalf of Metgün-Eze-Atis Ordinary Partnership or having a business agreement with it, shall not accept gifts or hospitality from parties involved in tender processes in which the company participates, except in cases where prior approval has been obtained from the Compliance Officer or where permission has been granted in accordance with the principles set out in this document, it is prohibited to accept gifts or hospitality from parties involved in tender processes in which Metgün-Eze-Atis Ordinary Partnership participates, or to share any confidential business information (bid prices or other commercial information) of any subcontractor, supplier, or business partner with a subcontractor, supplier, or partner involved in the same process.

### 2.13. USE OF INTERMEDIARIES

If Metgün-Eze-Atis Ordinary Partnership uses an intermediary, the Company manager involved in the relationship must ensure that the reputation, background and capacity of the intermediary is adequate by conducting a Metgün-Eze-Atis Ordinary Partnership Merit Assessment. Metgün-Eze-Atis Ordinary Partnership expects the contracted intermediaries to act in accordance with the code of ethics of Metgün-Eze-Atis Ordinary Partnership.

The agreement between Metgün-Eze-Atis Ordinary Partnership and the intermediaries must reflect in writing the true, full and complete relationship between the parties. The ethical performance of Metgün-Eze-Atis Ordinary Partnership and its related intermediary should be regularly monitored and necessary improvements should be made over time.

### 2.14. LOBBYING and POLITICAL ACTIVITIES

Lobbying is a specialized type of intermediation that influences approaches and decisions in the public and private sectors. Lobbying may only take place if the person engaging in such activity clearly states that he or she represents the Metgün-Eze-Atis Ordinary Partnership and intends to influence the opinion of the other party. Contracts with lobbyists should clearly state this obligation.



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Metgün-Eze-Atis Ordinary Partnership does not support politicians or political parties and does not make payments to political parties, organizations or their representatives.

Employees are free to participate in democratic political activities but must notify the Compliance Officer in advance and such activities must be conducted without reference to Metgün-Eze-Atis Ordinary Partnership and without using Metgün-Eze-Atis Ordinary Partnership resources.

### 2.15. PREVENTION OF MONEY LAUNDERING

Metgun-Eze-Atis Ordinary Partnership does not allow its resources to be used by individuals and entities for money laundering and does not allow these illegal resources to be presented as legal. Failure to show the forensic source of money or property, even when engaged in lawful activities, can also sometimes be attributed as crime. Money laundering also includes the use of legal funds for terrorism or crime.

Metgun-Eze-Atis Ordinary Partnership would never aid, abet or condone money laundering. Metgün-Eze-Atis Ordinary Partnership always complies with anti-money laundering laws, takes all possible precautions, inquires into the merit of the parties involved, and to this end, always works with reliable and reputable subcontractors, suppliers and business partners, taking care to reasonably trace the source of the money.

Metgün-Eze-Atis Ordinary Partnership, its branches or affiliates, lobbyists, senior managers, board members, employees, contractors, agents, and anyone acting on behalf of Metgün-Eze-Atis Ordinary Partnership, are responsible for the payments made by the company, particularly payments made to subcontractors, suppliers, or business partners engaged in suspicious activities, and must ensure that these payments do not involve any irregularities. If any payment is, or is suspected to be, inconsistent with these rules, employees should report it directly to their superiors and the Compliance Officer.

Without the approval of their superiors and the Compliance Officer, employees of Metgün-Eze-Atis Ordinary Partnership must never: make payments to people who are not legally entitled to receive the funds or who are not a party to the transaction; receive payments from people who are not legally entitled to receive the funds or who are not a party to the transaction; accept cash in hand, even if a secure banking system is in place; make shipments to customers that are inconsistent with Metgün-Eze-Atis Ordinary Partnership regulations; or conduct foreign exchange transactions with unauthorized entities.

### 3. PRINCIPLES FOR FIGHTING AGAINST BRIBERY and CORRUPTION

Metgün-Eze-Atis Ordinary Partnership carries out its activities within the applicable sectoral methods and rules. Metgün-Eze-Atis Ordinary Partnership attaches utmost importance to business ethics and fair competition. For this reason, it does not tolerate any breach of the



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principles of the fight against bribery and corruption contained in this regulation. These rules must be followed by all branches and affiliates of Metgün-Eze-Atis Ordinary Partnership, its senior managers, board members, employees, contract workers, subcontractors, suppliers, business partners, intermediaries, lobbyists, and anyone acting on behalf of Metgün-Eze-Atis Ordinary Partnership.

Anti-corruption laws exist in almost every country, and their purpose is to prevent bribery and similar practices. Violation of these laws may result in heavy fines for the company and imprisonment for individuals. The mere suspicion or implication of a violation of these laws, either locally or internationally, is enough to discredit Metgun-Eze-Atis Ordinary Partnership and put its employees at risk and should be reported to the Compliance Officer and the Legal Department as soon as it becomes known.

Bribery occurs when an attempt is made to influence a person's work in order to gain an unfair advantage. Work done under influence occurs when an improper advantage is given to one person in order to influence the work done by a third party. These may include cash payments, commodities, loans, credits, discounts, travel, hospitality and rendering services.

Corruption is an irregular and immoral behavior in the decision-making process due to a change in the consent of the decision-maker in exchange for a reward or the expectation of a reward. Influencing the decision-maker's consent is never accepted as an excuse and is strictly prohibited by these Rules.

It is prohibited for an employee of Metgün-Eze-Atis Ordinary Partnership to provide any promise or condition that would provide another person with a financial or other advantage, facilitate the improper obtaining of a job, reward a decision, or facilitate the obtaining of a resource. An employee of Metgun-Eze-Atis Ordinary Partnership may not respond to a request for the same purpose. This undue advantage also applies if the undue advantage comes directly or indirectly in the form of a request for assistance from third parties, or in the form of a request for assistance from an intermediary, supplier, subcontractor, joint venture or affiliate.

The subject of the prohibitions may be a public official, a political party, an agent or employee of a client doing business in the public or private sector, or a lending institution, a bank. Public officials include, but are not limited to, public or government officials, agents, employees or representatives; officials, agents, employees or representatives of any political party or political parties; candidates for any public office or political party; members of public organizations; officials or employees of international organizations; international judges or their employees; and finally employees of companies under government control or owned entities.

It is strictly forbidden for an employee of Metgun-Eze-Atis Ordinary Partnership to receive a bribe or any benefit of any kind for making a decision that would provide a monetary or any



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other advantage to a third party. Prohibitions applicable to bribery and influence peddling apply to both the person offering and the person accepting and implementing it. Such a request or offer is sufficient as an indication of non-compliance. The prerequisite for the occurrence of a situation of improper advantage is not that the person who intends to take advantage of it puts it into practice.

Metgün-Eze-Atis Ordinary Partnership may be found liable for any bribery or other improper conduct committed by third parties engaged by Metgün-Eze-Atis Ordinary Partnership, such as suppliers or subcontractors. For this reason, Metgün-Eze-Atis Ordinary Partnership also expects third parties with which it does business to take risk mitigation measures against bribery and corruption.

Facilitating payments are payments made to expedite mandatory administrative regulations and formalities through legal channels. Although such payments are tolerated in some countries, they are illegal. The Metgun-Eze-Atis Ordinary Partnership prohibits such payments in principle.

Metgün-Eze-Atis Ordinary Partnership will not impose penalties or sanctions on any of its employees, even if they suffer loss of employment or damage to their trade name due to compliance with anti-bribery and anti-corruption principles.

### 3.1. GIFTS, MEALS and HOSPITALITY

The Company aims to ensure that business decisions made by Company employees, subcontractors, subcontractors or suppliers, business partners, intermediaries, lobbyists and anyone else who may act on behalf of the Metgün-Eze-Atis Ordinary Partnership do not give rise to any personal gain or conflict of interest. It is not permissible to give gifts or any form of hospitality in order to influence a business decision or to gain an advantage. The same applies to receiving gifts or hospitality.

Employees of Metgün-Eze-Atis Ordinary Partnership must not allow their family members or relatives to accept gifts, money, loans, invitations or similar offers of special treatment that may be made by people who have a business relationship with Metgün-Eze-Atis Ordinary Partnership in order to influence business decisions, and must not allow their family members or relatives to make similar offers to such people. Thus, employees of Metgün-Eze-Atis Ordinary Partnership and those acting on behalf of Metgün-Eze-Atis Ordinary Partnership should not accept any gifts, directly or indirectly, except for promotional products with the company logo on them and of minimal or insignificant value. In cases where the refusal is misunderstood, the gifts received shall be immediately returned to Metgün-Eze-Atis Ordinary Partnership and the gift received shall be treated as a fixture of Metgün-Eze-Atis Ordinary Partnership.



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Offers of hospitality, such as social events or meals, are acceptable where there is an open and fair working relationship. The cost of hospitality should be kept to a minimum, and information about the people receiving hospitality should be documented. Travel, accommodation, and similar expenses that may arise during such hospitality for employees of Metgün-Eze-Atis Ordinary Partnership should be paid by Metgün-Eze-Atis Ordinary Partnership. In order to provide or benefit from gifts, hospitality and similar advantages, prior approval must be obtained from the senior manager.

For this reason, the following rules should be considered and applied:

- Business courtesy can only be offered or accepted for a legal purpose.
- It must be based on a valid employment relationship justification.
- It must comply with Metgün-Eze-Atis Ordinary Partnership Code of Business Ethics Regulation on the Principles of Combating Bribery and Corruption.
- Acts of workplace courtesy provided to or by employees should not occur very frequently when evaluated collectively with other acts of workplace courtesy during a specific period. Employees are required to consult with the Compliance Officer in advance if they have committed or participated in an act of business courtesy to the same recipient more than 6 times in the last 12-month period.
- The act of business courtesy should not be done in secret from other employees of the Company or related people. The act of business courtesy should not be extravagant and wasteful but kept within reasonable limits.
- Gifts in cash or cash equivalents (such as gift certificates) should never be permitted.
- Travel, accommodation and other expenses of Metgün-Eze-Atis Ordinary Partnership personnel must always be paid by the Company.
- All gifts and acts of business courtesy must be completed and approvals obtained. The completed form should be sent to the Compliance Officer and information should be provided.
- It must comply with limits. Acts of business courtesy over monetary limits are subject to written approval by the General Manager before being offered or accepted. The limits for giving/receiving gifts and business courtesies and the people for whom approval must be obtained are specified below.

| GIVING/PROVIDING | Per Capita Value       | Approved by   |
|------------------|------------------------|---|
| Gifts            | Between USD 20 and 100 | A Senior Manager, Deputy General Manager                  |
|                  | More than USD 100      | A Senior Manager, Deputy General Manager, General Manager |



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| Food/Entertainment  | 100 USD and more       | A Senior Manager, Deputy General Manager                                      |
|---|------------------------|---|
| Accommodation (per night)   | 200 USD and more       | A Senior Manager, Deputy General Manager, General Manager                     |
| Travel Expenses   | Any value              | A Senior Manager, Deputy General Manager                                      |
| If 6 or more business courtesy actions were given to the same recipient within the past 12 months | Any value              | A Senior Manager, Deputy General Manager, Compliance Officer                  |
| ACCEPTING/PARTICIPATION   | Per Capita Value       | Approved by   |
| Gifts and everything else   | Between USD 20 and 100 | A Senior Manager, Deputy General Manager                                      |
|   | 100 USD and more       | A Senior Manager, Deputy General Manager, Compliance Officer                  |
|   | 200 USD and more       | A Senior Manager, Deputy General Manager, Compliance Officer, General Manager |

### **3.2. APPROACH TO PUBLIC OFFICIALS**

Metgün-Eze-Atis Ordinary Partnership does not authorize any direct or indirect payments, in cash or otherwise, gifts, promises or other advantages, and does not authorize any gifts, benefits or promises of any kind, either directly or through an intermediary, a close family member of an intermediary or an agent, to any public official, political party or third party, in violation of the law.

“Immediate family members” include spouses, partners, children (biological or adopted), grandchildren, parents, grandparents, siblings, spouses and children of siblings, or any household member. For this reason, payments made by a distant relative to any government official may also be considered a crime.



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These rules, without being limited to these, include the UK Bribery Act 2010, the US Foreign Corrupt Practices Act (FCPA), the OECD Convention on Combating Bribery of Foreign Public Officials, UN anti-corruption conferences, or anti-money laundering, anti-corruption, or anti-conflict of interest laws in the countries where Metgün-Eze-Atis Ordinary Partnership operates. Metgun-Eze-Atis Ordinary Partnership should never do business with any person who has violated anti-corruption laws.

In light of the information above, Metgün-Eze-Atis Ordinary Partnership employees, officers, branches, and affiliates, as well as subcontractors, suppliers, and business partners, should not accept or give any gift, money, bribe, commission, or anything of "value" that creates an unrecorded asset for the purpose of influencing business agreements or for any other reason. The term "of value" includes goods, services, and non-cash benefits or advantages.

Additionally, without being limited to the above, it includes cash or cash equivalents, real estate purchases/sales, services at inflated or reduced prices, hospitality, cars, jewelry, household goods, travel, debt, debt securities, or shares. Something of value can also apply to benefits that have no monetary value. Examples of this include insider information, stock tips, or facilitating the arrangement or outcome of a transaction in an illegal manner.

When establishing relationships with public officials, due diligence must be exercised. Metgun-Eze-Atis Ordinary Partnership does not allow any gift, payment or thing of value to be offered to Public Officials that is not covered by this Code.

### 3.3. SOCIAL AID, CHARITY WORKS and POLITICAL AID

Charitable contributions are contributions made to organizations for charitable, educational, scientific, or artistic purposes. Although social and charitable contributions are legal and accepted by the international business community, they should be scrutinized carefully for the risk of corruption. Under no circumstances may a social or charitable contribution be made on behalf of the Company to influence an institution, political party or especially a public official to decide or to withdraw a decision.

The company must conduct a "Merit Assessment" to ensure that any social or charitable contribution made under any circumstances does not directly or indirectly provide personal benefit to a public official.

All social and charitable contributions must be based on a written contract that includes the contributions of Metgün-Eze-Atis Ordinary Partnership, the contributions of other participants, the project's purpose and benefits, milestones, timeline, and costs. The contract must include anti-corruption clauses and must be approved by the Compliance Officer and the Legal Unit with the necessary audit clauses added.

Metgün-Eze-Atis Ordinary Partnership, its employees, officers, branches, and affiliates, as well as its subcontractors, suppliers, business partners, agents, lobbyists, and all personnel



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acting on behalf of Metgün-Eze-Atis Ordinary Partnership, shall not make any political contributions or support any political figure or party.

Donations and social assistance should only be made to organizations, public bodies or eligible individuals that inspire confidence that the donation or assistance will be used for the purposes of the Code of Business Ethics. Therefore, a detailed review of the organization to which the donation will be made should be conducted, and potential “red flags” should be evaluated. In donations to public institutions, if a public official could personally benefit from the donation or social assistance, the relevant donation or social assistance should not be made.

Necessary documents and records regarding donations and social assistance must be kept, and the relevant form must be prepared by the staff of the requesting Metgün-Eze-Atis Ordinary Partnership and approved by its manager. Donations and social aid should not be made in cash and should be accurately reflected in the accounting accounts.

### 3.4. CASH MOVEMENTS

Metgün-Eze-Atis Ordinary Partnership has determined the methods for controlling, recording and reporting cash movements. In principle, every transaction is checked, recorded and reported. The uncontrolled use of cash movements carries a high risk of corruption. To mitigate this risk, Metgün-Eze-Atis Ordinary Partnership has created a reliable control mechanism over the use of the cash box and related accounting records.

Cash transactions should only be used when electronic payment or bank transfers are not possible. All cash movements should be recorded in the accounting account regardless of their monetary value and compared with the original invoices that clearly show the purpose of the expenditure.

All cash disbursements must be recorded with the original receipt or invoice.

## 4. LIABILITY FOR COMPANY ASSETS

### 4.1. ASSET PROTECTION

Every employee of Metgün-Eze-Atis Ordinary Partnership is responsible for ensuring that the Company's assets are not misused or wasted. Company assets consist of physical property as well as time, proprietary information, company facilities, company funds and company materials. Employees of the Metgun-Eze-Atis Ordinary Partnership, always;

- Ensure that the goods and objects used are not damaged, misused or wasted.



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- Protect the Company's confidential information, proprietary information and intellectual property rights. Should use these assets for their intended purpose. Must not use company assets for their own personal benefit or for the benefit of anyone other than company employees.
- Theft of the Company's products and equipment, theft or misappropriation of information, embezzlement through manipulation of time and expense reports may result in termination of employment and criminal prosecution. The Company applies the same sanctions to theft among its employees as it applies to theft of Company assets.
- Written approval from the Compliance Officer is required for an employee to use Company assets outside of work (such as using Company property outside of work or using Company material for personal gain).
- The employee must not engage in personal activities during working hours that may prevent him/her from fulfilling his/her responsibilities.
- The employee must not engage in commercial or legal/unethical activities unrelated to work using Company computers and equipment.
- The employee should not use his/her position in the Company or the acquisitions obtained through the Company's assets and information to obtain financial gain.

Examples of company assets include cash, fixed assets, employee time spent at the company or products produced, computer systems and software, telephones, wireless and mobile communication devices, photocopiers, printers, company vehicles, property information, and the company's registered trademarks.

### 4.2. ACCURATE INFORMATION, ACCOUNTING and REPORTING

Investors, lenders and other shareholders have a legitimate interest in the financial accounting and reporting of Metgün-Eze-Atis Ordinary Partnership. Credibility in financial accounting and reporting depends on the accuracy, completeness and timeliness of accounting records. Therefore, Metgün-Eze-Atis Ordinary Partnership reports company information accurately, objectively and honestly. This information includes financial and non-financial records and reflects any information, transactions and events that are created accurately. These reports include financial data as well as other information such as HSE performance information or HR records.

Metgün-Eze-Atis Ordinary Partnership complies with all applicable laws and regulations in terms of record keeping, identification and, where necessary, reporting. The principle of Metgün-Eze-Atis Ordinary Partnership is to be honest, open and transparent at all times



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about its activities and the performance and results of its activities. All financial transactions must be fully and completely entered into the accounting records of Metgün-Eze-Atis Ordinary Partnership.

Employees must never engage in actions such as concealing, altering, or destroying property or information related to a lawsuit, investigation conducted by the government or a regulatory authority, or any other matter pertaining to the Metgün-Eze-Atis Ordinary Partnership. This requirement also applies to any future litigation or investigations that may arise.

### 4.3. INFORMATION and INFORMATION TECHNOLOGY SYSTEMS

The records kept in the Information Technologies (IT) systems of Metgün-Eze-Atis Ordinary Partnership are considered to be the property of Metgün-Eze-Atis Ordinary Partnership. Therefore, unless prohibited by law or agreement, Metgün-Eze-Atis Ordinary Partnership has the right to access all such information.

The employee is responsible for keeping his/her electronic files and archives in an organized manner. Special purpose use is permitted on a restricted basis. No offensive, inappropriate, illegal, obscene photos, messages or files should be downloaded, stored or posted. Metgün-Eze-Atis Ordinary Partnership fully complies with the necessary rules against copyright problems that may arise in written materials, photographs and software within the framework of intellectual and industrial rights. Thus, it is forbidden to download, store or publish anything that violates intellectual and industrial rights.

## 5. ORGANIZATION, RESPONSIBILITIES, EXECUTION, IMPLEMENTATION

### 5.1. ORGANIZATION

The Code describes the basic principles of conduct expected of employees, subcontractors, suppliers and business partners doing business with Metgün-Eze-Atis Ordinary Partnership. It is the responsibility of the Board of Directors to ensure that Company employees are aware of these rules and that the principles are sustainable. The Board of Directors appoints the Company Compliance Officer and the Compliance Committee.

The Compliance Committee, together with the Compliance Officer, reports to the Board twice a year on implementation and any necessary changes are discussed there.

### 5.2. RESPONSIBILITIES

Each employee must familiarize himself/herself with the Code and applicable laws and regulations and perform his/her duties in compliance with them.



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Employees sign a declaration acknowledging that they have read and understood the rules and agree to comply with them and comply with similar notices. Failure to understand the rules or refusal to sign the declaration cannot be considered an excuse for non-compliant behavior.

Managers are responsible for making sure that the activities in their areas of responsibility are in line with the rules set out in this document. Managers are responsible for communicating the rules written here to employees and guiding employees in the application and interpretation of these rules.

### 5.3. COMPLIANCE COMMITTEE and COMPLIANCE OFFICER

The Company, through the Board of Directors, appoints a Compliance Officer and Compliance Committee to ensure and monitor the implementation of the “Code of Business Ethics Regulation on the Principles of Combating Bribery and Corruption” policy.

The Compliance Committee reports directly to the Board of Directors. The Compliance Committee, together with the Compliance Officer, should report to the Board of Directors every six months on the implementation of these rules and possible improvements and updates.

Any guidance or regulations developed and issued by the Compliance Committee and approved by the Board of Directors must be implemented by all those affected by these rules.

#### 5.3.1. Compliance Committee

The Compliance Committee will consist of at least 3 people, including a Member of the Board of Directors (or Advisor of the Board of Directors on behalf of the Board of Directors), Legal Counsel and Compliance Officer, and the chairman of the committee will be a member of the Board of Directors.

The Compliance Committee assists the Board of Directors in overseeing the Company's corporate responsibilities and compliance efforts in its fields of activity. The Committee holds regularly scheduled meetings at least two (2) times a year. In addition, the Committee meets regularly on matters that members wish to be considered separately and privately. The Committee may hold meetings with other executives of the Company from time to time if deemed appropriate by the Chairman.

The Committee will keep meeting notes and records with the Compliance Officer and records of its other activities, and the Committee's meeting notes will be distributed to all members.



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The Committee is responsible for monitoring the fact that the Company's activities are carried out in compliance with the Code of Business Ethics within the framework of sectoral and international standards, legal business life trends and public policies. The Committee may make appropriate recommendations regarding the application of these rules, including but not limited to the following;

- To provide the Compliance Officer with the necessary and sufficient monetary and other resources and personnel to fully fulfill his/her responsibilities.
- To ensure that the written rules and regulations governing the Company are implemented and that office and other employees are guided accordingly in their daily work processes; to provide training to responsible business partners, members of the Board of Directors, managers, office staff and employees, and other business partners of the Company who support the Company's public applications, government affairs including policy support, and charitable activities.
- To determine the efficiency of the Company's compliance efforts and related risks on a regular basis.
- To monitor and audit the Company's processes and transactions.
- To investigate the reported incidents of non-compliant and erroneous behavior.
- To improve standards through disciplinary measures and incentives.
- To make necessary revisions to the written rules.
- To develop an ethical culture.

The Compliance Officer will report to the Committee any significant non-compliant practices that may affect the Company. In addition, significant non-compliance information regarding the Company's employees will also be reported to the Chairman of the Committee by the Compliance Officer. The Committee will review the rules on a regular basis and, when necessary, propose amendments to the Board of Directors.

### 5.3.2. Compliance Officer

The duties and responsibilities of the Compliance Officer include, but are not limited to, the following:

- To monitor the preparation and publication of regulations to guide employees in the face of specific legal and regulatory obligations, compliance clauses and situations affecting ethical business conduct.
- To prepare materials, documents and update proposals for the Company's ethical business rules and to submit them to the Compliance Committee, to organize



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trainings for all stakeholders to ensure that these rules are understood and kept in mind.

- To identify internal and external corruption risks that the company may face.
- To conduct an annual efficiency assessment of the Company's anti-corruption program; through the assessments, demonstrate how well the Company is implementing relevant policies and regulations at the time of operations.
- To investigate violations of the Code or inappropriate activities, or to follow up on existing investigations.
- To assist in the conduct of merit review.

### 5.4. MERIT ASSESSMENT

Any relationship or agreement with a third party is a source of risk because of the possibility of direct or indirect legal liability and/or reputational damage to third parties acting on behalf of Metgün-Eze-Atis Ordinary Partnership. As there are risks of harm when individuals or companies act on behalf of Metgün-Eze-Atis Ordinary Partnership, the Company must make every effort to compel these individuals and companies to adhere to ethical standards. For the avoidance of doubt, the definition of "third party" includes all business partners, operators, subcontractors, suppliers, intermediaries, agents, agencies, lobbyists, customers and anyone acting in concert with the Metgun-Eze-Atis Ordinary Partnership.

In order to establish or change an employment relationship with a third party, such party must comply with the requirements of Metgün-Eze-Atis Ordinary Partnership's Merit Assessment. The Merit Assessment is conducted to prevent Metgün-Eze-Atis Ordinary Partnership from entering into a relationship with any transparency issues, conflicts of interest or "Red Flags" and prevents Metgün-Eze-Atis Ordinary Partnership from doing business with corrupt parties. Otherwise, Metgun-Eze-Atis Ordinary Partnership may be associated with illegal or unethical parties. The Compliance Officer develops and implements the relevant regulations in connection with the Merit Review. Examples of "Red Flags" can be found in Annex 1.

The scope of the Merit Assessment review depends on the risk status of the transaction or party in question. Every employee of Metgun-Eze-Atis Ordinary Partnership must be alert to the possibility of a red flag of corruption or compliance risk. The Compliance Officer should be involved in the preparation of each Merit Assessment report, which will include the results of the study and recommendations for improvement, if necessary. Assess the existing risks on a new or continuing agreement with a third party and report to the Board of Directors through the Compliance Committee with its recommendations.

Agreements with the parties must include all provisions necessary to comply with applicable laws and the ethical requirements of Metgün-Eze-Atis Ordinary Partnership. Anti-corruption



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provisions should be written and kept up to date. Any changes to the printed provisions must be approved by the Compliance Committee.

### 5.4.1. Identification of the Companies to be Evaluated

When working with third parties, it is critical to conduct sufficient due diligence to understand the third party's experience, real owners and reputation. When selecting third parties, Metgün-Eze-Atis Ordinary Partnership places a high level of importance on their compliance with ethical principles. It promotes its ethical principles to partners, subcontractors and suppliers doing business with Metgün-Eze-Atis Ordinary Partnership and works only with companies that undertake to comply with Metgün-Eze-Atis Ordinary Partnership Code of Business Ethics. This is also stated in contracts and purchase orders.

It is neither possible nor necessary to eliminate all ethical/compliance risks posed by the third party. Furthermore, since not all third parties pose the same level and type of risk, it is not realistic to examine all third parties to the same extent.

The main contract/expected contract amount or order amount/annual expected order amount between the third party with whom the business relationship will be established and Metgün-Eze-Atis Ordinary Partnership (PO) (total amount of different contracts/order orders at the relevant location of the third party) Works exceeding the USD 100,000 limit are included in the scope of preliminary evaluation. For these companies, research is conducted from different sources, and in case of any negative findings, a detailed merit assessment is carried out on the companies. Metgun-Eze-Atis Ordinary Partnership Group companies are not considered.

Internet searches are conducted through a variety of sources, including global sanctions lists, public records, negative news checks, checks on legal databases, third-party litigation history, use of specialized databases, credit checks, lists of "prohibited and disqualified companies and people" published by regulatory agencies, and lists of "politically exposed people (PEPs)".

### 5.4.2. Evaluation Method

Once third parties are determined to be "in scope", the next step is to investigate the risk identified in the preliminary assessment in detail across different channels and determine the level of risk.

Prior to the assessment, the Company Merit Assessment Survey Form is sent to third parties to gather information on the company's structure, ethics/compliance management system, compliance with labor laws & human rights, potential conflicts of interest, possible legal proceedings related to the company, relationships with third parties and government agencies, gift and donation practices, personal data privacy practices, money laundering, and



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terrorist financing. The department responsible for establishing contact with the company is responsible for sending and following up on the survey. Each page of the incoming survey must be paraphed with the company stamp and the signature of an authorized manager.

The accuracy of the incoming information is assessed using the pre-assessment information and the risk level of the third party is determined. This assessment is made by the Compliance Manager, and support is obtained from the Central Legal Department in legal matters. The result of the assessment is recorded in the Third Parties Ethics & Compliance Merit Assessment Form. The risk level of the company is assessed as "high", "medium", "low" or "no risk". The risk assessment should be documented with a reasonable number of evidence documents.

Identification of risks in the assessed issues does not mean that the business relationship with the third party will not continue. Measures can be implemented to reduce the level of risk identified.

The approval and post-approval processes require strong collaboration between the department wishing to engage with the third party, the relevant headquarters department and the Compliance Department. Once the risk assessment and due diligence processes have been completed, approval must be obtained to decide whether to proceed with the third party. The Central Legal Department, the project department entering into the business relationship, the manager of the relevant central department and the Compliance Officer take part in the approval of the business relationship to be entered into with low and medium risk third parties. For high-risk third parties, the approvals of the General Manager must be obtained in addition to these sections.

### 5.4.3. Tracking

Merit evaluations are updated according to the schedule below, based on the specified risk category, as of the date of the evaluation.

| RISK LEVEL  | UPDATE         |
|-------------|----------------|
| High Risk   | Every 6 months |
| Medium Risk | Every 1 year   |
| Low Risk    | Every 2 years  |

The following monitoring activities should also be implemented to mitigate the identified risk in business relationships with medium and high risk third parties.

- Detailed review of third-party payment claims and entitlements
- Obtaining the third party's annual declaration of compliance with applicable anti-corruption laws
- Providing training to company managers and employees on ethics and compliance issues



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- Periodic renewal or updating of risk assessment processes
- Periodic and/or risk-based audits of third parties
- Adding clauses on ethics and compliance with contracts

### 5.5. RISK ASSESSMENT and REPORTING

The Compliance Officer shall assess at least once a year the external corruption risks to which Metgün-Eze-Atis Ordinary Partnership may be exposed (e.g., arising from commercial transactions or business partnerships, and internal corruption risks, non-compliance with anti-corruption policies and regulations). Based on this assessment, the Compliance Officer prepares a report to be submitted to the Board of Directors through the Compliance Committee. The report includes the internal and external corruption risks that Metgün-Eze-Atis Ordinary Partnership may face and the measures that can be taken to eliminate them.

Metgün-Eze-Atis Ordinary Partnership establishes an anti-corruption compliance assessment program to be implemented regularly by the Compliance Officer. The purpose of this assessment is to regularly review the anti-corruption policies and regulations and to examine how these policies and regulations are implemented within the operations of Metgün-Eze-Atis Ordinary Partnership.

### 5.6. CONTACT

The rules are shared with all employees. The rules are also available on the Metgün-Eze-Atis Ordinary Partnership's internal network and website. The rules are communicated during induction orientation, internal communications and classroom training.

In order to ensure effective communication with external parties, inquiries about Metgün-Eze-Atis Ordinary Partnership or its employees should be directed to the relevant communication unit or the Compliance Officer.

Employees who will make a press statement must act in accordance with the above-mentioned conditions. Employees should not make statements about the Company's financial results, prospective financial performance or business activities unless specifically instructed to do so. Employees must be careful at all times to ensure that Metgun-Eze-Atis Ordinary Partnership or its shareholders are not harmed by any outside source of communication. It should be well known that individuals who violate the rules on disclosure of non-public information may expose themselves and the Company to legal sanctions.

### 5.7. MANAGEMENT OF RULE VIOLATIONS AND SUSPICIOUS CIRCUMSTANCES

All employees must immediately report any possible violation of the Code. Suspected violations may be reported to the employee's manager, the manager's supervisor, the Compliance Officer or any member of the Board of Directors, as well as other reporting



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mechanisms established by the Company. Metgün-Eze-Atis Ordinary Partnership undertakes that no sanctions will be taken against the person who notifies in good faith. All reports and notifications are followed by the Compliance Officer. If reports are made anonymously, the Compliance Officer and the Compliance Committee shall keep the source of the report confidential.

Upon receipt of a report involving a violation of anti-corruption laws and regulations, the manager should promptly submit the matter in writing to the Compliance Officer.

All employees should raise valid concerns in good faith. Even if these concerns are raised in good faith but turn out to be unfounded, there should be no suspicion or fear that they may be sanctioned. Notification should be made when the following violations or hazards are considered to exist:

- Violation of Metgün-Eze-Atis Ordinary Partnership Code of Business Ethics Regulation on the Principles of Combating Bribery and Corruption
- Behavior that could discredit the Metgün-Eze-Atis Ordinary Partnership
- Criminal activities
- Endangering health and safety
- Failure to comply with any legal or professional obligation
- Bribery
- Performing an act that is likely to cause harm to employees.
- Damage to the environment
- Unlawful disclosure of confidential information.

If an employee has a reasonable suspicion or concern that any inappropriate behavior, including the situations described above, has occurred, they must report it. If the employee is in doubt as to whether a matter is reportable, he/she should consult the Compliance Officer.

### 5.7.1. Principles for Raising Concern

The aim of the Company's management and the Compliance Officer is to ensure that employees are aware of the following issues and report their concerns:

- The notification must be made with honesty, integrity and in good faith.
- The notification must be in sufficient detail to enable the necessary investigation to be carried out effectively.
- If an employee makes a report knowing it to be false or unfounded or makes untrue allegations in bad faith or for personal gain, they will be subject to disciplinary action.
- The review of the notification shall be conducted under the strictest confidentiality.
- Disclosures are expected to relate mainly to the actions of employees of Metgün-Eze-Atis Ordinary Partnership but may also relate to the actions of business partners. Therefore, individuals who have a valid reason to be concerned about violations of the Code of Business Ethics by business partners are encouraged to share their concerns.



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- Metgün-Eze-Atis Ordinary Partnership undertakes that it will not impose any sanctions on people who inform authorized people, company units or other authorities in the company about possible violations of the company's code of ethics, laws or other rules, and will not be considered in a way that may harm them.
- Notices may be made by subcontractors, suppliers, business partners, agents or any other person, other than employees.

### 5.7.2. Forms of Reporting Concerns

Normally, an employee's complaint should be directed to the manager of the relevant department to ensure that the chain of authority is followed. In this way, the issue will reach the senior management of the relevant unit. Senior executives are obliged to inform the Compliance Officer about notifications regarding ethics and compliance. Employees may report directly to the Compliance Officer if they choose to do so or if the reports concern their manager(s).

Notifications can be made face-to-face or by phone or e-mail. Notifications and documents supporting the notification can be sent to the e-mail address [etik@metgun.com.tr](mailto:etik@metgun.com.tr). Reports of ethical violations can be made via the "Ethics Line" to +90 (212) 3582010, extension 1454. Employees or others may file an anonymous complaint (silent mechanism). However, in order to effectively investigate anonymous complaints, the matter needs to be explained in detail. One of the main criteria for deciding whether a matter warrants investigation is whether sufficient information is available for the investigation. If the person making the complaint has given their name, their identity will be kept confidential in accordance with this Code in the interests of honesty, fairness and openness. However, if for any reason the complainant is uncomfortable using the usual grievance reporting channels, he/she may also submit his/her complaint directly to the Compliance Officer. The Compliance Officer and the Compliance Committee shall honor the individual's request for anonymity within the framework of these rules.

The confidential mechanism is implemented to enable employees, subcontractors, and suppliers to file complaints confidentially in the event of any violation of these Rules, including suspicious accounting transactions and audit issues, as well as unethical or fraudulent matters. It is also used to receive, maintain, and address similar confidential complaints.

### 5.7.3. Review and Reporting of Notification

Factors such as confidentiality concerns, possible legal processes, problems that may arise due to actual or alleged ethical or illegal violations, and potential reputational damage can make the process challenging and complex. This process, by its very nature, involves accusations or allegations against employees within the company. Failure to exercise due



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diligence in the review of notifications may lead to legal problems and complications of various dimensions.

The review of the report is conducted to determine whether there are any actions or behaviors defined as ethical/compliance violations in the regulations, to determine the extent of the violation if it exists, to take appropriate measures, and to identify ways to remedy any actual or potential damage and losses. In addition, notification review includes activities such as gathering information and documents from relevant sources as part of investigations and research aimed at preventing the recurrence of actions, and preparing reports to inform relevant units about the conclusions and findings reached.

All reports will be shared with the Compliance Officer, who will conduct a preliminary review, with support from different departments within the company, to determine the scope of the matter and the individuals involved. The Chair of the Compliance Committee, the Compliance Officer and, depending on the content of the notification, the relevant line manager will decide on the procedure to be followed in the evaluation of the notification.

Work done on the subject must be reported in writing for the termination of a notification. Reporting is made to the Compliance Committee and other people deemed appropriate by the Committee. Violation of the ethical values of Metgün-Eze-Atis Ordinary Partnership may result in disciplinary action, dismissal with or without warning and, if necessary, reporting the situation to the relevant authorities.

### 5.8. TRAININGS

The Code of Business Ethics Regulation on the Principles of Combating Bribery and Corruption training for Metgün-Eze-Atis Ordinary Partnership personnel, which covers the principles of Metgün-Eze-Atis Ordinary Partnership's policies and regulations on business ethics and includes questions and answers, is provided to employees at fixed workplaces and projects during the recruitment period. It is also repeated annually and, where necessary, applied to the managers of subcontractors.

The Compliance Officer will regularly, or when deemed necessary, send reminder publications explaining the content of a topic of the Code of Business Ethics and examples of its violation in practice.

Commitment and declaration forms are prepared in which all personnel declare that they have read, understood and accepted all of the regulations.

Suppliers' purchase orders and subcontractors' contracts contain a clause in which they undertake to comply with Metgün-Eze-Atis Ordinary Partnership Code of Business Ethics.



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### 5.9. AUDIT and REVIEW OF THE RULES

Compliance with the Code will be monitored by the Compliance Officer and reported to the Board of Directors through the Compliance Committee every six months.

The Compliance Officer conducts audits, investigations and reviews to protect the rights and interests of the company and employees, to develop recommendations against internal and external ethics & compliance risks and to provide reasonable assurance. The Company's Board of Directors and the General Manager provide the necessary resources to ensure that the Company employs personnel of sufficient quality and number and has the appropriate working environment and technical equipment to ensure an effective audit activity.

The Compliance Officer is authorized to access all departments, records, assets, information, documents, regulations and personnel that may be relevant to the subject matter in annual audits to be conducted or in special examinations to be assigned. The personnel of the audited department are obliged to provide direct information about transactions or activities that may harm the Company or cause material losses. If any level of management prevents access to the aforementioned information, document or document, the next higher level manager must explain the reasons for such prevention and the Compliance Committee must be informed.

The Compliance Officer carries out his/her work within the framework of the audit calendar and appropriate programs. The audit schedule is made as a result of risk assessments and by considering the requests and suggestions of the General Manager. Except for ordinary audits, no preliminary program is prepared for activities such as investigations, examinations and special audits.

The General Manager and the senior management of the project/company to be audited are informed before the site work begins. At the end of the site work, the findings, risks and recommendations related to the audited function/department/process are documented, and an agreement is reached with the relevant manager on the findings. The actions to be taken regarding the findings of the audit are prepared by the department audited and sent to the Compliance Officer.

In addition to the audit reporting made during each visit to the project, the Compliance Officer also reports to the Board of Directors every six months on the general scope of work during the year.

Metgun-Eze-Atis Ordinary Partnership reviews these rules once a year and may make additions or amendments. Comments or suggestions on the Code from all employees are welcomed. Employees shall be informed of any significant changes to the Code.

### 6. FORMS

- UYM-EK-03-01 Red Flags
- UYM-FRM-03-01 Employee Commitment and Declaration Form



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- UYM-FRM-03-02 Business Partners Commitment and Declaration Form
- UYM-FRM-03-03 Third Party Merit Evaluation Questionnaire
- UYM-FRM-03-04 Third Party Merit Evaluation Decision Form
- UYM-FRM-03-05 Donation and Social Aid Evaluation Form
- UYM-FRM-03-06 Conflict of Interest Declaration and Resolution Form
- UYM-FRM-03-07 Gift Business Courtesy Evaluation Form

*This is an English translation. In case of any difference in meaning between the original Turkish text and the English translation, the Turkish text shall apply.*