

WORKING PRINCIPLES AND CODE OF ETHICS POLICY

Aim:

The purpose of this policy is to describe the Trakya Döküm Working Principles and Ethical rules, which are to be followed in all activities carried out at Trakya Döküm, and the steps to be taken in case of violation by employees.

Scope:

All Trakya Döküm employees, including Trakya Döküm management, the companies from which Trakya Döküm receives goods and/or services and the employees of these companies, persons and organizations working on behalf of Trakya Döküm, including suppliers, consultants, lawyers, external auditors (includes business partners).

Responsibility:

In this context, all Trakya Döküm employees and representatives acting on behalf of Trakya Döküm are obliged to act in accordance with the Trakya Döküm Working Principles and Code of Ethics in all their behavior and business actions.

It is the responsibility of every employee to share decisions and behaviors that are incompatible with business ethics through ethical reporting channels.

In case of violation of the policy, criminal sanctions are applied depending on the nature of the incident.

In order to ensure compliance with the Working Principles and Code of Ethics, Trakya Döküm Disciplinary Board regularly provides advice and guidance to its employees on these principles and rules, examines allegations of violations seriously, imposes sanctions that may lead to termination of employment in case of violation, takes the necessary corrective and preventive actions, and makes the necessary updates and improvements in its Principles and Code of Ethics.

1. Trakya Döküm Introduction;

Trakya Döküm is an IATF 16949 certified, world-class casting production facility that produces raw, machined and assembled parts made of high-quality ductile iron, gray and malleable cast iron for the needs of the automotive, white goods, hydraulics, construction, machinery and other sectors.

Trakya Döküm, which started its operations in 1980 as one of the 4 companies of Soyak Holding, is not only a casting production facility with today's high technology, but one of the distinctive features that distinguishes it from its competitors is; It has the opportunity and ability to serve not only as a product supplier but also as a product development partner.

Quality, cost and delivery performance, employee satisfaction and environmental awareness are the main indicators followed by Trakya Döküm and are the driving force of the investment and improvement efforts in the company.

Trakya Döküm has been among the top 500 largest industrial enterprises in Turkey for many years in the reports published every year by the Istanbul Chamber of Industry.

Trakya Döküm, which has modern, vertical molding casting production technology, produces high quality ductile iron, gray, temper, vermicular, high silicon and SiMo alloy casting, machined and assembled parts ranging from 0.1 kg to 40 kg.

Trakya Döküm production facilities, located 140 km west of Istanbul, have an annual casting part production capacity of approximately 100,000 tons with 7 vertical molding production lines.

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1.1 Vision;

To be a reliable global brand that produces sustainable and innovative solutions.

1.2 Mission;

To deliver products and services beyond customer expectations.

To demonstrate the necessary sensitivity for responsible use of natural resources to fulfil the needs of future generations and for the protection of our planet.

1.3 Trakya Döküm Values;

As Trakya Döküm San ve Tic. A.Ş., we are based on goals and principles that we have determined, and we carry out our decisions and actions in the light of the principles of integrity, honesty, responsibility, trust and respect.

- Stakeholder Orientation
- Responsibility and Accountability,
- Continuous improvement and innovation,
- Sensitivity to society and environment

As Trakya Döküm employees and management, we exhibit attitudes and behaviors that will ensure cultural integrity within the framework of these values.

2.1 Behaviors Expected from All Employees

- All employees working at Trakya Döküm are expected to understand their responsibilities within the framework of the Working Principles and Code of Ethics and behave in accordance with this policy.
- All employees at Trakya Döküm adhere to the principles and ethical rules of Trakya Döküm throughout their entire careers.
- Trakya Döküm employees evaluate whether their own and their colleagues' behavior complies with ethical rules.
- Employees should set an example in their community in terms of general ethical standards outside the workplace.

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2.2 Behaviors Expected from Managers

- Trakya Döküm managers must always be role models for appropriate behavior within the framework of the Working Principles and Code of Ethics.
- It must be ensured that all employees and stakeholders with whom they have business relations on behalf of the company understand their responsibilities within the framework of Trakya Döküm's Working Principles and Code of Ethics.
- People should be provided with an environment of respect and trust in the workplace.
- They must create an environment where employees can freely express their thoughts without fear of retaliation.
- When evaluating employees, compliance with Trakya Döküm Working Principles and Code of Ethics should be taken into consideration.
- They should not tolerate work, actions or transactions that are contrary to Trakya Döküm's Working Principles and Code of Ethics, and should not direct employees and other persons representing the company to work, actions or transactions that are contrary.
- They should carefully listen to the questions within this scope and seek help from Trakya Döküm ethics line for questions they cannot answer.

3.0 OUR PRINCIPLES AND POLICIES

3.1 Respect for Human Rights / Social Responsibility

As Trakya Döküm, we aim to be the ideal company that will ensure sustainable growth, create added value, consist of the most successful and competent professionals, and that everyone is proud to be a part of.

We adopt the United Nations Declaration of Human Rights and aim to ensure that our Ethical Principles and relevant policies are compatible with these principles.

We take great care to treat all of our employees equally and be fair, and we expect the same attitude from all of our stakeholders.

- In recruitment, we look for job suitability as the only criterion, regardless of gender, language, religion, race, color, age, nationality, differences of opinion and wealth.
- We reward success with fair and competitive wage policies, effective and objective performance evaluation system and practices.
- We aim to increase our employees' loyalty to the company by providing equal opportunities in appointments, promotions, rotations and rewards.
- We provide equal opportunity and possibilities for training, guidance and development of our employees.
- We create a working environment that encourages transparency and mutual respect, where cooperation and solidarity are the most important elements.

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- We do not tolerate any form of discrimination.
- We provide clean, healthy and safe working conditions to our employees.
- We respect the unionization and collective bargaining rights of our employees.
- We do not tolerate any form of violence or harassment.
- We do not tolerate child labor, slavery, human trafficking and forced labor.
- We use company resources responsibly.

3.2 Compliance with the Law in All Circumstances

We act in accordance with the laws of every country in which we do business, and in cases where the legislation is unclear, we act in accordance with our Ethical Principles, and by consulting the competent authorities when necessary.

As Trakya Döküm, we see intellectual and industrial property rights as an important tool to achieve sustainable competitive advantage and best business results. In this context, our basic principles in this field are to protect our distinctive innovations and strong brands in the markets where we do business, to create value from our portfolio, to be open to collaborations in this scope, and to respect the intellectual and industrial property rights of third parties.

We comply with legal regulations in the processing of personal data and take the necessary precautions. In this context, as Trakya Döküm, we act in accordance with the local and international legislation to which we are subject, and the principles determined in the processing of personal data.

We record all our commercial activities and records completely and clearly, and we ensure that agreements made with third parties are clear and understandable in accordance with the legislation, our Ethical Principles and policies.

3.3 Fighting Bribery and Corruption

As Trakya Döküm, we carry out every job we do and every decision we make in accordance with TD Working Principles and Ethics. In accordance with the United Nations Global Compact, we resolutely take the necessary measures to combat corruption and bribery. In line with our Code of Ethics and related policies, it is strictly prohibited to provide an advantage to domestic or foreign government officials and to other third parties to obtain an illegitimate benefit, regardless of whether they are public officials or not. This prohibition also includes providing, offering, promising or accepting anything of value from any third party, directly or indirectly related to Trakya Döküm's commercial activities, in order to influence their decisions. All of our employees are obliged to comply with local and relevant international legislation and relevant Trakya Döküm policies regarding the fight against bribery and corruption, and we expect all our Business Partners to act in accordance with the relevant regulations.

Gifts and Hospitality

Gift and hospitality practices within Trakya Döküm must adhere to the following rules:

- They must comply with applicable laws.
- They must not be in cash or cash equivalents.
- They must not influence any decision-making process in our business relationships.
- They must not damage Trakya Döküm's reputation if made public.

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3.4 Prevention of Conflicts of Interest

As Trakya Döküm employees, we are committed to making decisions based on our roles and responsibilities without being influenced by personal interests that could benefit ourselves or our relatives or create such an impression. We strive to avoid any situation where our personal interests may conflict with our responsibilities to Trakya Döküm. If we find ourselves in a potential conflict of interest, we share the matter with the ethics hotline to avoid any harm that this situation may cause to us and our company. To prevent potential conflicts of interest:

- We avoid obtaining benefits for ourselves or our relatives by abusing our titles or powers.
- We ensure that our personal investments outside of work do not interfere with the time and attention required to perform our duties at Trakya Döküm and do not create conflicts of interest.
- If we have a family relationship or other close ties with key decision-makers in our Business Partners' commercial activities related to Trakya Döküm, we inform the "ethics hotline" about this situation.
- Having a family member, relative, partner, close friend, or similar close relationship within Trakya Döküm can create a conflict-of-interest risk in some situations. If employees are in a position to make or influence decisions related to hiring, termination, performance evaluation, or disciplinary processes involving such individuals, they must inform the "ethics hotline" in advance and transfer the task to a company employee without a conflict of interest.

3.5 Compliance with Economic Sanctions and Export Controls

- The process of integrating income obtained through illegitimate means into the financial system in order to show it as if it was earned through legitimate means is called money laundering. As Trakya Döküm, in compliance with local and international legislation, we avoid any commercial transaction that may be seen as laundering of proceeds of crime, and therefore, before entering into a business relationship with third parties, we make the necessary situation assessment to get to know the relevant party.
- As Trakya Döküm, we do not enter into business relationships with third parties about whom we do not have sufficient information or about whom we have negative intelligence, who pose a risk or raise suspicion for these and similar reasons. As a globally operating company, we take effective and necessary measures to comply with regulations regarding economic sanctions and export controls.
- In this context, we do not establish commercial relations with people on the embargo and sanction lists, and if there is a necessity to establish direct or indirect contact, we always obtain approval from the Legal Department before contact is made.

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3.6 Confidentiality and Protection of Information

- We know that using or sharing personal, commercial, financial, technical, legal, and/or similar confidential information belonging to our company, employees, or Business Partners for our own or third parties' benefit is prohibited. We take the necessary measures to protect the confidential information we are privy to due to our roles and responsibilities. We use the information we acquire only for the tasks we are obligated to perform according to our job descriptions. We comply with relevant legislation and contractual obligations when sharing trade secrets and other confidential information. We protect the confidential information we have acquired even after leaving Trakya Döküm and do not share it with third parties.

3.7 Donations, Sponsorship, and Community Investments

We make donations to support social development in the geographies where we operate and sponsor activities in line with our principles. We carry out donation and sponsorship processes transparently and take care that these activities do not conflict with Trakya Döküm values or commercial interests.

We do not donate or sponsor any activities that violate human and animal rights, promote tobacco, alcohol and drugs, or harm nature. We do not donate to or sponsor activities of organizations that discriminate on the basis of gender, language, religion, race, color, age, nationality and difference of opinion.

Social Investments

We invest in environmental and social issues by developing long-term collaborations in line with the needs of the geography in which we operate. We care that our social investments are in line with our business priorities and are realized in cooperation with institutions or individuals who are experts in the field.

Political Activity

We do not donate to political parties, politicians or political candidates. On the other hand, we respect and do not limit our employees' voluntary participation in legitimate political activities. Company resources (vehicles, computers, e-mails, etc.) cannot be used for political activities or personal donations for this purpose. Demonstrations, propaganda and similar activities for political purposes are not permitted within the company's work areas.

3.8 Compliance with Competition Law

As Trakya Döküm, we act within the framework of legal regulations and our company policies in all countries where we operate, in a manner befitting our reputation. We do not take part in any practice that would be contrary to the rules of competition law.

Our basic principles within the scope of competition law are as follows:

- To comply with the regulations related to competition law,

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- Except for the limits permitted by the legislation, not to engage in agreements and behaviors with competitors or other persons or organizations, directly or indirectly, that have the purpose of preventing, distorting or restricting competition or that have or may have this effect,
- To obtain information on competitors only through methods stipulated by legislation and case law and using it in all relevant documents by citing the source,
- To avoid behaviors that may be considered as abuse for our company, which is in a dominant position in the market in which they operate,
- To avoid all kinds of meetings and communications that may lead to or be characterized as such in other private or professional meetings, and meetings that bring competitors together, such as meetings of associations, councils, chambers, professional unions, conferences, fairs, etc., in which the company is represented,
- Dealing with issues that may violate competition law within the company with the same care and diligence.

3.9 Creating a Healthy and Safe Work Environment

As Trakya Döküm, one of our biggest goals is to create a healthy and safe work environment for our employees and to ensure that our Business Partners, such as our suppliers, also create such a work environment. For this purpose, we take all kinds of measures and try to increase awareness in this field by providing training within the scope of occupational health and safety.

We carry out our activities in a healthy and safe manner without putting our employees, suppliers, contractors and society at risk. To realize this, we use facilities with safe design, work with competent people and prioritize safety in our processes.

At Trakya Döküm, human life is a priority and no work is too important to be done without taking safety and health measures. Our employees comply with all legal regulations on Occupational Health and Safety and our Group policies and immediately report unsafe working conditions to our communication channels. We immediately report any accident, injury or unhealthy situation. We identify our emergency scenarios and make appropriate preparations; we know what to do in case of an emergency.

3.10 Use of Social Media Accounts

As Trakya Döküm, we continue to take part in social media, which has a strong growth trend in the world and in our country in recent years, in accordance with our company principles and brand values. We know that personal social media accounts are everyone's private spaces and we respect their sharing preferences. On the other hand, we are aware of the benefits that can be gained from the proper use of social media, as well as the significant reputational risks it can bring to our Company. For this reason, when sharing on social media, we refrain from sharing content that may lead to disagreements and uncertainties on corporate issues and from sharing information and photos that violate the privacy rules of companies. In our social media posts, we always ensure that we act in accordance with legal regulations and Trakya Döküm Code of Ethics and related policies.

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3.11 Acting Honestly and Fairly in Relations with Stakeholders

Stakeholders refer to all parties affected by Trakya Döküm's activities and whose activities affect Trakya Döküm, and our basic principles in our relations with our stakeholders are stated below:

- We make decisions with objective criteria in our selection of suppliers, subcontractors and contractors, and we pay attention to be in business relations with parties that attach importance to human rights, take into account the principles of anti-bribery and anti-corruption, and fulfill their legal obligations.
- We keep our communication channels with our stakeholders open and always take their complaints and suggestions into consideration.
- We always comply with confidentiality rules in our visits and audits to our stakeholders.
- We expect all our stakeholders to comply with the relevant laws and regulations at all times.
- We refrain from expressing personal opinions to the public, and when it is necessary to inform the public, only authorized employees make statements on behalf of Trakya Döküm.
- We always provide honest and reliable information to the public and media. We do not make statements that contradict our ethical values in press releases.

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4.0 Raising Concerns / Breach Notification

As Trakya Döküm; we know that violations of our Code of Conduct and Ethical Principles threaten the general interests of individuals, companies and society; cause injustice, material and moral damages; and that it is a conscientious duty to inform the competent authorities to put an end to such situations.

Trakya Döküm attaches great importance to honesty and accountability in all its business. It is our duty to maintain a culture of honesty and respect, and to oppose behaviors that may be contrary to the Company's ethical standards.

In order to best manage the company's reporting mechanism, those who witness or suspect any misconduct or unethical behavior are expected to voice their concerns.

Those involved in investigations of alleged violations observe the following basic principles.

The identity of the reporting person is kept confidential. The investigation is conducted in confidence. The rights of the accused person are respected during the investigation of the allegations.

Reportable matters include, but are not limited to, the following:

- Crimes such as theft and fraud
- Any form of discrimination (race, religion, language, color, gender, age, etc.)
- Violation of ethical rules, laws, moral values and legal regulations
- Threat to the safety or health of the community
- Fraud in accounting records
- Bribery Corruption / Abuse
- Revealing company secrets
- Laundering the proceeds of crime
- Environmental damage
- Harassment /Mobbing

You can make your reports and notifications to the ethics hotline via "etikhat@trakyadokum.com.tr".

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