

Codes of Conduct

Business Ethics Codes and Application Principles

1. General Provisions

1.1. Purpose

The purpose of this booklet is to place ethics culture, to determine codes of conduct that the employees within ASAŞ need to comply while performing their tasks and to help them to act in accordance with these principles.

1.2. Scope

“Business Ethics Code” covers all managers and employees including Members of Board of the company and subsidiaries and all of these persons will be referred to as “employees” below.

2. Our Basic Business Ethics Values and Principles

2.1. Integrity and Reliability

Honesty and reliability are our primary value in all our business processes and relations. Our employees act in accordance with laws of Republic of Turkey, international legal rules and moral values while they reach company objectives.

2.2. Confidentiality

As ASAŞ employees, we care confidentiality and protection of private information of our customers, colleagues and other persons and organizations that we work together with. We protect confidential information of company activities, use these information only in accordance with ASAŞ purposes and share with authorized persons. We do not transfer works such as confidential information, documents, regulations and projects of company, use for our interests against ASAŞ while leaving the company.

2.3. Justice and Equality

We treat fairly to our shareholders and each other, we prevent discrimination. As ASAŞ employees, we do not take any notice of differences such as race, nationality, language, religion, gender and social status between customers, subcontractors and suppliers, and avoid from prejudiced attitudes.

2.4. Productivity

We utilize from existing sources to reach company objectives and work as result-oriented. We use time properly to be more efficient and productive while doing a job, dedicate ourselves to our jobs, complete that job as possibly as the best and most successfully and seek the ways to do the job better. We measure our performance fairly and attentively, set realistic and reachable goals and evaluate our performance in accordance with these goals.

2.5. Open Door Policy

We resolve many issues before they become problems in ASAŞ. “Open Door” policy encourages employees to explain their ideas and opinions, to mention their worries and complaints and to ask questions under the condition of remaining in legal and ethical limitations. All managers support this policy by “keeping their door open” for their subordinates and other personnel who want to reach them.

3.Business Ethics Codes

3.1 Conflict of Interest

We observe and prevent the situations where interest of ASAŞ and persons and organizations related to ASAŞ may conflict. It is among the most important responsibilities of all employees not to use company resources, name, identity and power for personal benefit, and to avoid situations that will adversely affect the name and image of the organization.

3.1.1. Engaging in Activities That Might Create Conflict of Interest

Employees cannot enter into business relations with their family members of third-degree relatives (uncle, aunt or niece and nephew). In case the specified persons’ companies or companies where they work have business partnership with ASAŞ, ASAŞ employees do not take part in any decision process related to these companies. In this case, the subject must be notified to relevant department manager and Local Ethics Consultant in advance. It is subjected to information and approval of Members of Board except for exceptional circumstances.

It is against the Business Ethics Codes that employees are in the position of manager or supervisor with people with whom they have a close relationship with kinship or a similar bond. The managers who have authority to recruitment and decision making cannot hire their spouses and close relatives (to third-degree relatives). In this case, the matter must be notified to department manager. It is subjected to information and approval of Members of Board except for exceptional circumstances.

3.1.2. Working Outside The Organization

It is essential for employees in ASAŞ not to work directly or indirectly in jobs to be considered as “tradesman” or “craftsman” and not to work for other persons and/or organizations in and out of working hours for a fee or similar interests. In case where ASAŞ employees are members of board or auditor in companies other than ASAŞ, this subject must be notified to Board in advance. Employees cannot take charge in rival or other companies who have business relationship with ASAŞ without approval of Board.

3.1.3. Misconduct

Employees cannot use their authorities for the benefit or themselves or their relatives cannot damage ASAŞ by exceeding their authorities. Employees cannot directly or indirectly generate personal income through third persons from all works and contracts to which ASAŞ is a party, such as activities, purchases and sales. They cannot use the opportunities (credit card, vehicle, driver etc.) given to them due to their duties for their special objectives, cannot act and behave against moral, law and company disciplinary.

3.1.4. Resource Utilization

In resource utilization to be made on behalf of the company, company assets, facilities and personnel without company interest regardless of the name. "Savings in every respect" principal is applied by all personnel. ASAŞ employees use the time well during business hours, do not spare time for personal affairs. Managers do not appoint employees for their personal affairs. It is essential not to accept personal visitors during business hours. Employees completes their meetings for mandatory visitors related to subject of visit and in a reasonable time without effecting the work flow.

3.1.5. Relations with Other Persons and Organizations That the Company Has a Commercial Relationship

A special relationship cannot be entered with ASAŞ customers, suppliers, contractors and other persons and companies that the ASAŞ has a commercial relationship, a loan of money, special discounts, goods or services for personal purpose cannot be taken and given.

ASAŞ bases its commercial relations on professionalism, honesty, seriousness, politeness and reliability. Insulting, discriminating and offensive attitudes must be avoided in all kinds of written or verbal interaction.

3.1.6. Relations with Media

The explanations to be made to media organizations about ASAŞ are made by Corporate Communication Department. The authority to make explanations about ASAŞ belongs to chairman of the board of the company, the members and general manager or other managers whom will be authorized by them. Making statements to broadcasting organization, making interviews, participating to seminar-conference etc. events as speaker cannot be made without written approval of senior management and personal income cannot be generated from these activities. Any treatment which will adversely affect the ASAŞ image must be avoided in performing professional or cultural activities in public places or sharing personal opinion and suggestion on different platforms (Twitter, Facebook, Instagram etc.) on internet. It must be acted by taking into consideration that it will be associated with ASAŞ in accordance with its duties and responsibilities.

3.1.7. Political Activities and Political Contributions

ASAŞ employees can personally and voluntarily be active in any political party. However, they cannot ask colleagues, customers and suppliers to make a political work, to be a member of a political party, to work on behalf of a political party or donations and similar activities on behalf of association or various organizations.

It is possible for employees to take active part in a political party with the following conditions and notifying general manager of the company in advance;

- The political activity that employees take part should not have any conflicts of interest with the task in the company.
- Employees cannot be engaged in any political activity during business hours in the workplace and take their colleagues' time related to these activities.
- Employees cannot use the name of the company, their position, title or resources of the company during political activities.

Our employees should not be engaged in social activities against interest and benefit of ASAŞ. However, they can take part in foundations, professional and social associations, and social security and charity fund established or to be established by company or employees or both of them provided not to interfere with the business hours and order. This association or club activities should not be any place discriminative and against the religion or benefit of society.

Resources and opportunities of ASAŞ cannot be used to support political activities, donated to political parties and political campaigns cannot be supported.

3.2 Accepting and Giving Gifts

It is essential ASAŞ employees not to accept gift or interest which will affect their objectivity, decisions and behaviors or to give gift or interest to third persons or organizations in this scope.

The codes of practice described below regulate the gift exchanges that might be with third persons or organizations with which ASAŞ employees have business relations and determine the principals to be applied on this.

Rules of Practice

1. ASAŞ employees are prohibited to take all kinds of interest and gifts which will affect or possibly affect their objectiveness, decision making and/or which have economical value above 50 USD, while they are doing their jobs.
2. Employees can take and/or give the following gifts under the condition being proper to the corporation objectives and legislation and not to leave ASAŞ in a difficult situation:
 - ASAŞ employees can give and take a catering and/or dinner in work processes provided that they comply with the rules in Authorization/Approval table.
 - Award, plate, statue etc. gifts which have symbolic value as day of remembrance can be taken in seminars and similar organizations which was participated in representing ASAŞ.
3. It is forbidden to take gifts or benefits that are explicitly paid for. Under no circumstances, accepting, giving and offering bribe or commission can be accepted.
4. ASAŞ employees are forbidden to accept uncovered or borrowed money from their subordinates, suppliers, consultants, competitors or customers, to make them pay their travel expenses, event costs and similar payments.
5. Gift and promotion materials to be given to customers, dealers and other third persons by ASAŞ are determined with approval of general manager by Corporate Communication Department. Extra permission for distribution of approved gift and promotion materials is not required.

Rejection of Gift, Dinner and Accommodation Offers:

When you faced with the gift, dinner or accommodation offers which are above the limitations given above, reject them politely and explain codes of conduct of ASAŞ in this regard. If the rejection of the gift gives offense to the person who gives it, or if the conditions under which the gift is given make it impossible to reject, you can accept the gift but you have to notify your manager in this regard. Local Ethics Consultant or Human Resources Department will guide you to donate this gift to a charity or share among the employees.

3.3. Protection of Confidential Information

Confidential Information can be defined as that belong to ASAŞ and not known by third persons and damage to company and/or its shareholders in case of known and all kinds of financial, strategic, technical, commercial, employees' personal rights and the subjects and information under the scope of non-disclosure agreement made with third parties. It is essential for ASAŞ employees, customers, suppliers and shareholders are attentive to protection these private information and it is not allowed to share these with third persons without their approvals. ASAŞ employees are expected to protect commercial secrets, confidential information, project details which requires privacy and to use them in accordance with their jobs and objectives of the company that they work for. Our employees should only share these under their authority and to related persons.

Employees should respect to intellectual property rights, commercial secrets, whatever personal data/private personal data they are familiar with which are described in The Law On The Protection Of Personal Data Numbered 6698 (KVKK) and related legislation of ASAŞ, its employees and customers. These kinds of information and data cannot be used or explained except where explicitly permitted. Any kind of information of data related to works of ASAŞ must be evaluated as "confidential information" by employees except when this information becomes known to the public by lawful means.

The principals on confidential information to be complied with are given below;

It must be act in accordance with the awareness that financial and commercial secrets of ASAŞ, information to weaken competitive capacity are in the "framework" of agreements with business partners and it must be attentive to protection of these and provision of confidentiality.

2. Attention must be paid on protection of confidential information of ASAŞ customers, suppliers, business partners and other third persons and organizations working with.
3. Information and documents obtained in accordance with the work cannot be unauthorized persons or departments in and out of the corporate for any purposes.
4. Personal salary should not shared with other employees, any effort should not be made to learn salary information of other employees and action should not be taken against the principle of salary confidentiality.
5. Employees should not be allowed to use others' e-mails either in and out of the company.

6. Persons should be personally responsible for the security of all computers and equipment which are commonly and personally used.
7. Confidential information of ASAŞ cannot be talked in dining hall, cafeteria, elevators, shuttle vehicles and other public places.
8. In case employees leave the company cannot use any information and document against ASAŞ, in accordance with their interest and in favor of third persons.
9. Approval from related person or senior management, if required, of the company must be taken for confidential information and documents which are required to be taken out in exceptional situations. When it comes to sharing information due to interest of ASAŞ, firstly non-disclosure agreement should be signed or confidentiality commitment should be taken from counter party related to security and protection of information shared with these persons and organizations.

Social Media

Disclosures and opinions should not be given on behalf of the company, except for the knowledge and approval of ASAŞ officials on social platforms (Twitter, Facebook, Instagram etc.) by taking the role of social media on our daily lives into account. You must inform Corporate Communication Department, responsible for media relations, for your concerns and hesitations related to news about ASAŞ that you have read or seen.

3.4. Establishing and Preserving a Fair Working Environment

ASAŞ accepts creation and maintenance the fair working environment for employees as the most important priority. It does not take any notice of differences such as race, nationality, language, religion, gender and social status between customers, subcontractors and suppliers, and avoid from prejudiced attitudes.

As ASAŞ, we reject the use of child labor except designated by law. We do not work with any supplier or contractor who use the children as workforce.

The principals on fair working environment are given below;

1. ASAŞ human resources policies and practices comply with all applicable laws and regulations regarding employment and business life and ensure that all practices such as recruitment, promotion, transfer, rotation, salary, rewarding, social rights etc. are fair. ASAŞ employees must fulfill all legal necessities in scope of their job definition and act in accordance with regulations.
2. A working environment which supports cooperation with the company and is positive should be created and conflict environments should be prevented and it should be provided that people with different beliefs, thoughts and opinions work in harmony. The private lives and personal spaces of employees should be respected.

3. Immunity violation of employees by physical, sexual and/or emotional harassment in workplace or other places where they are due to work are contrary to laws and codes of conduct and ASAŞ shows no tolerance towards these crimes.
4. Similarly, tolerance is not shown who act and behave negatively against those who make complaints and notices about any harassment or those who assist during the investigation.

We are committed to fostering a work environment where collaboration and solidarity are core values, and where transparency and mutual respect are actively upheld. In line with this commitment:

- a. All forms of discrimination are strictly prohibited.
- b. Violence, harassment, and workplace bullying of any kind will not be tolerated.
- c. We maintain zero tolerance for child labor, slavery, human trafficking, or any form of forced labor.
- d. We fully respect our employees' rights to freedom of association and collective bargaining. The decision to join or not join a union lies solely with the employee. The employer does not interfere, apply pressure, discriminate, or retaliate in any form.

3.5. Provision of Occupational Safety and Protection of Environment

ASAŞ aims to leave healthy, clean, livable and sustainable world to next generations. For this aim, high standard applications in the frame of related legal legislation and regulation are used in our environmental protection activities.

Environmental rule violation which may damage to health of employees, customers and people who live in area where we carry on a business are avoided. While taking business decisions, reports related to damage to the environment are issued and acted to minimize adverse effects and taken the preventive measures.

ASAŞ employees are very valuable for our company. The highest safety standards are aimed to protect employees work for both ASAŞ and contractor.

All employees have liability to follow applicable law and related legislation as well as safety and security procedures of ASAŞ.

Use of Alcohol, Drugs and Substances:

ASAŞ respects the personal preferences of employees, however the use of addictive drugs are considered as a serious problems which threatens employee's health and occupational safety. The use of all kinds of substances (alcohol, drugs etc.) which affects working performances of our employees or endangers safety of workplace is strictly prohibited. This prohibition covers the fact that the employees are under the influence of these substances when they enter to ASAS building or facilities and does not affect the job performance. A disciplinary proceeding is launched about the employees who use these kinds of substances in ASAŞ building or facilities or employees subject to the above mentioned situations.

4.Our Responsibilities

4.1.1. Responsibility for Compliance with Laws and Regulations

ASAŞ acts in accordance with laws and regulations of domestic or foreign country where it carries on a business. Information, documents and records related to these activities are kept neatly and completely and preserved. All kinds of reports, presentations, financial statements and footnotes which will be disclosed to public or submitted to competent authorities are issued studiously, rightly and transparently in accordance with laws, legislations and company regulations.

4.1.2. Responsibilities Towards Employees

ASAŞ ensures that personal rights of employees are fully and correctly used. It honestly and fairly approaches to employees and commits a non-discriminatory, safe and healthy working environment. It makes necessary effort for personal development of our employees and supports them to be volunteer in social and communal activities where they will take part with social responsibility awareness.

4.1.3. Responsibilities Towards Customers

ASAŞ works with a proactive approach with customer satisfaction orientation, responding to the needs and demands of its customers in the shortest time and in the most correct way. ASAŞ honestly and fairly acts its all customers and makes necessary efforts to fulfill its commitments to them in a timely and promised manner.

4.1.4. Responsibilities Towards Suppliers and Business Partners

ASAŞ meticulously protects confidential information of persons and organizations whom it works with and its business partners. It fairly and respectfully treats to suppliers and business partners and makes necessary efforts to fulfill its obligations in a timely manner and to prevent, eliminate and resolve conflicts that may arise.

4.1.5. Responsibilities Towards Competitors and Industry

ASAŞ competes on legal and ethical ground, complies with rules of competition law and avoids from unfair competition.

4.1.6. Responsibilities Towards Community and People

ASAŞ attach importance to protection of democracy and human rights to make education and charity works and to annihilation of crimes and corruption. It supports all kinds of activities and organizations that will increase the responsibility towards the society within the scope of corporate social responsibility, and gives priority to the development of environmentally friendly technologies. ASAŞ acts sensitive to the traditions and cultures of the countries where it carries on a business. Protection of health and respect to the environment bear in mind in all applications.

5. Implementation of Codes of Conduct

All employees must fill an approval form that states they read and accepted to comply with Business Ethics Codes. Failure to read Business Ethics Codes or sign the approval form does not make excuse for employees to not to comply with principles and rules of Business Ethics Codes.

5.1. Ethical Committee

“Ethical Committee” is created in ASAŞ to approach ethical violations or ethical dilemmas. Ethical Committee are responsible to investigate and solve complaints and notices related to violation of ethics codes in scope of ASAŞ Business Ethics Codes. The Ethical Committee, which works under the Chairman of the Board of ASAŞ Alüminyum San. ve Tic. A.Ş. consists of people in the following positions;

Chairman of Ethical Committee: General Manager of The Company

Member of Ethical Committee: Internal Auditing Department Official

Member of Ethical Committee: Financial Affairs Department Official

Member of Ethical Committee: Human Resources Department Official

Member of Ethical Committee: Corporate Communication Department Official

Our employees are suggested to apply and consult following managers respectively, before applying Ethical Committee:

- Related Department Manager
- Human Resources Manager

5.2. Local Ethics Consultant (LED)

Representatives will be assigned to consult in Business Ethics Codes in every facility of the company. These representatives will be selected by General Manager of the company and will start their job with the approval of Ethical Committee. Local Ethics Consultant’s tasks are given below:

To guide and to mentor in subjects and issues submitted by employees related to Codes of Conduct,

- To refer to Ethical Committee when obtained information against Business Ethics Codes,
- To make recommendations for improvement to the Ethical Committee regarding the Business Ethics Codes when necessary,
- To ensure confidentiality of personal information of those who notified contrary situations to Business Ethics Codes.

If the issues which are considered as against to the codes of conduct cannot be solved by these people, following channels can be used for questions and notifications and directly contacted to Ethical Committee.

E-mail: etik@asastr.com&ethics@asastr.com

ASAŞ Alüminyum San. ve Tic. A.Ş. Rüzgarlı Bahçe Mah., Kumlu Sok., No:2 ASAŞ İş Merkezi, 34810 Kavacık

5.3. Application Method

All company employees has right to convey their claims to Ethical Committee about those who act against to Business Ethics Codes. The identity of the people making the notification is kept strictly confidential within the scope of possible investigation that can be carried out after the notification.

The identities, titles, specialties etc. of those who applied to Ethical Committee exceptional circumstances can be estimated due to environmental factors. In these cases, all kinds of psychological pressure that may occur due to confidentiality which cannot be provided except the control of Ethical Committee is prevented by Ethical Committee and relevant person is protected and guarded in all conditions.

The Company is firmly committed to safeguarding the rights of employees who report concerns to the Ethics Committee. Retaliation in any form against individuals who make such reports will not be tolerated. Disciplinary action will be taken against anyone found to have engaged in retaliatory conduct.

The accuracy of the subject claimed by employee is determined, in case of serious loss of interest is detected by ASAŞ and / or possible loss is prevented, the person who notified can be awarded with the suggestion of Ethical Committee and decision of Board.

In case slandering or unfounded notifications due to various reasons, this subject is also evaluated by Ethical Committee.

Employees can ask the following questions to themselves about the subject which they hesitate the conformity to Business Ethics Codes and decide if a certain action is ethical:

1. Is this behavior in compliance with laws, rules and traditions?
2. Is this behavior in compliance with policy and procedures of ASAŞ?
3. Would I be disturbed if someone else (or rival company) behaved like this?
4. What would I feel if this behavior published in the newspaper, television or internet?
5. How would I explain what I did, if I gave statement in the court room?
6. Could I defend what I did to my family, children and friends?

5.4. Resolution of Non-Compliance with Business Ethics Codes

Ethical Committee take all possible Business Ethics Codes violation notifications seriously and take stable steps in investigating the claims in confidentiality. Ethical Committee may appoint Internal Audit Department to investigate violations of Business Ethics Codes.

All employees are liable to act transparent, to transfer all the information and documents that they deem beneficial which are requested or even if not requested from them without delay and in full to healthy and fair investigation of the subject and give right answers to all questions asked to them in all investigations conducted.

Those who violate Business Ethics Codes or company policies or procedures will be subjected to termination of employment agreement depending on type and scope of the violation and to starting legal proceedings. The sanctions in question are valid not only for employees who misconduct but also for those who ignore and do not report this situation or take action to prevent, capture or denounce the situation, or to try to prevent potential violations.

5.5. Enforcement

Business Ethics Codes is approved by Chairman of Board of ASAŞ Alüminyum San. ve Tic. A.Ş. and entered into force on 11.04.2019.

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