



CODE OF ETHICS PROCEDURE

1. PURPOSE: This Code of Ethics Procedure, (hereinafter referred to as "Procedure") ÇELİKAĞ MÜHENDİSLİK MAKİNE SANAYİ Tic. In order to improve the reputation of 's (hereinafter referred to as "Company") in its commercial and other economic activities; It determines the application standards of the rules of conduct that must be followed by all employees regardless of their expertise, qualifications and position. Norms of the procedure; It regulates the situational behavior of employees according to the principles of morality, honesty, justice and partnership required for the successful operation of the company.

2. SCOPE and RESPONSIBILITY: It covers all employees of ÇELİKAĞ MÜHENDİSLİK MAKİNE SANAYİ TİC. Human Resources and Administrative Affairs Department is responsible for the implementation of this procedure.

3. DEFINITIONS:

a. Representation costs: These are the official welcoming and/or reception expenses of representatives of other companies participating in negotiations in order to establish and/or maintain mutual relations.

b. Business ethics: It is the set of rules that regulate the relationships that arise in the business communication process.

c. Corporate culture: Values, beliefs, traditions and moral norms of behavior that are mandatory for all employees of the company and determine their behavior.

D. Company resources: The company's tangible and intangible resources, including the people it owns and employs due to its activities, the machines, materials, tools it uses, intellectual property, reputation, information and knowledge resources, documents, communication tools and communication channels, software and cash. It covers.

to. Confidential information: It means information that has limited access in accordance with the legislation of the Republic of Turkey, does not contain any state secrets, and has limited access.

f. Conflict of interest: Situations arising from activities, interests or relationships that may affect or are considered likely to affect the interests of the Company by Company employees.

4. APPLICATION

4.1 Growth Strategy of Our Parent Company The growth strategy of our Parent Company is stated below.

The Company's Mission: To be a reliable supplier that creates high added value for shareholders, improves the quality of life of employees and people where the Company's assets are located, and produces high quality products by meeting the needs and demands of customers in order to make the Company a world leader in industrial, technology and innovation fields.

Strategic Goal of the Company: To become a leader among world manufacturers with the same production capacity in terms of income provided to shareholders.

Mission of the Company: It is our company's mission to achieve the vision of implementing a success strategy based on satisfaction in consumer demands in order to gain a wide range of products produced and sold by qualified experts working with team spirit. Achieving our mission ensures growth and maximum return on investment, thereby increasing market share in terms of value and volume.

Strategic goals of the company:

- Focused, segmented and diversified product portfolio,
- Excellent commercial marketing and sales, focused on customers in markets,
- Minimizing supply chain-related costs, taking into account marketing restrictions,
- Gaining leadership positions in markets that enable us to grow.

The main objectives will be achieved following the implementation of the following strategic objectives:

Customer:

- Focusing on markets in commercial, geographical and sectoral terms,
- To meet the current and future needs of our customers.

Activity systems:

- Maintaining its position as a low-cost producer in the global industry,
- Achieving a leading position in the development and application of new technologies in the following areas

Management, Production, Organization of business processes

Human resources:

- To motivate all employees to achieve goals through professional development and satisfaction with working conditions,
- Ensuring high work efficiency,
- To provide social security.

Health, safety and environment:

- Ensuring occupational health and safety,
- Reducing harmful effects on the environment

Attractiveness of investments:

- Ensuring high profitability,

- Establishing a systematic system in line with the management systems that are pioneers in the world and in Turkey and protect the interests of investors,
- Ensuring strategic and operational continuity and development through risk management.

4.2 Compliance with Legislation and Internal Regulations of the Company:

Company employees must unconditionally comply with the terms and regulations of all legislation in force in the Republic of Türkiye and other Procedures that concern or cover the Company.

In cases of possible disputes or hesitations that are contrary to the legislation of the Republic of Türkiye and will damage the reputation of the Company, employees should consult the Company Legal Department.

4.3 Social Values and Social Responsibilities of the Company:

The company is fully committed to ethical principles and standards. The company values honesty and diligence the most.

Fidelity to these principles and norms is a prerequisite for the Company's sustainable success in the global market. The company ensures that ethical principles and social responsibilities are included in business relations.

defends. The company implements social programs on a voluntary basis by applying the principles of partnership and cooperation with the business world and public authorities.

Carrying out the activities of social programs and maintaining efficient and quality relations with the central and local government; They aim to raise the business reputation of the Company, increase the attractiveness and competitiveness of investment, and at the same time ensure that the quality of life of the citizens of the country of operation is increased, the environment and human rights are protected, and the Company grows as an independent and responsible company.

4.4 Occupational Health and Safety and Environmental Protection:

The company considers human life as the most important value. The health and safety of employees are among the Company's main priorities.

Company:

- Prioritizes the life and health of its employees,
- Informs employees about occupational health and safety and environmental protection and continuously ensures that their knowledge and skills on these issues increase,

Organizes and carries out activities to prevent environmental pollution resulting from potential accidents and emergencies,

- Reaches officially accepted norms and conditions in the fields of occupational health and safety and environmental protection,

- Reduces harmful effects on the environment and humans by using energy-saving technologies and taking appropriate measures. Responsibilities of company employees:
- Continuously improve their knowledge about occupational health and safety and environmental protection,
 - Must know the current and potential risks that are harmful to his health, life and environment in his position,
 - Understanding the importance of the environment and the need to protect it for future generations, one should use natural resources and energy resources economically and be sensitive to the environment. Managers at all levels of the Company are directly responsible for ensuring safe production conditions for the health and life of the Company's employees.

4.5 Implementation of Employees' Legal Rights:

The company accepts labor rights arising from the law as an integral part of human rights. The Company carries out activities in accordance with all legal rights of employees and their right to honor when successful results are achieved, stands against discrimination, forced labor and mobbing, and supports the participation of employees in decisions made for the development of the Company. The company implements personnel development programs that include training and professional development, social packages, motivation methods, working and rest conditions for employees. The company supports practices that strengthen employee loyalty, increase discipline and efficiency, and work traditions within the team.

4.6 Internal Corporate Culture:

4.6.1 Personal relationships within the company:

All employees have the right to work in an environment of respect and understanding. Relations between company employees should be based on mutual respect, obedience and loyalty in the context of superior-subordinate relations. Dialogue between employees should be in a way that does not offend the honor and dignity of the other person.

4.6.2 The company's relations with the companies it has business relations with:

Company employees must maintain maximum objectivity and impartiality in their relations with other companies and must make every effort to conduct these relations within the framework of the principles of justice, mutual respect, moral codes of conduct and legislation of the Republic of Turkey. Company employees cannot store, change or misuse any information to obtain personal benefit from the Company or other companies with which the Company is affiliated.

4.6.3 Workplace and appearance rules:

Workplaces, production and administrative facilities should be organized in accordance with occupational health and safety and fire safety rules, in a way that is ergonomic, aesthetic and does not hinder work functions. The company undertakes to

provide its employees with the necessary work clothes, work shoes and other personal protective equipment in accordance with the working conditions and seasons. Employees who do not wear work clothes and shoes due to their position do not have to dress in a single style. However, clothing should be appropriate for the business environment, modest and conventional.

4.6.4 Gifts, participation in events and representation expenses:

The company makes every effort to treat all individuals and organizations with whom it has commercial relations fairly and impartially. For this reason, Company employees should not give or receive any gifts that could affect commercial decisions, should not invite or accept to take part in festivals, sports and entertainment events, should not spend on entertainment expenses, or should not take other similar actions. Company employees may give or receive gifts from individuals or organizations, participate in activities or make expenses on behalf of the company, only if all of the following criteria are met;

- Gifts or expenses directly related to the subject on non-routine days such as national holidays, special days and anniversaries,
- Gifts and expenses that are not in the nature of luxury, cash or negotiable instruments,
- Not intended to provide a hidden fee for accepting some decision regarding any service, act, omission, grant of rights, transaction, agreement, contract, licence, license or the like, or to influence the recipient of the gift for any illegal or unethical purpose. gifts and expenses,
 - Gifts and expenses that do not pose a risk of loss of reputation to the Company, its employees or other persons if heard,
 - Gifts and expenses that do not violate the rules, principles and requirements contained in this Code of Ethics Procedure, the company's Anti-Corruption Procedure and other applicable internal company procedures,
 - Requests for gifts or favors that are not implied/requested in any way by the employee. The rules specified in the legislation of the Republic of Turkey are essential for gifts to be given to public officials and expenses to be incurred.

4.6.5 Employee commitment to the company:

Company employees should be proud of their company for the work they do in the company. For this reason, employees avoid making negative comments when talking about the Company and its activities, inside and outside the Company. Employees are aware that they are representatives of the company, directly or indirectly, and that the reputation of the Company depends in many respects on the behavior and speech of employees.

4.6.7 Use of company resources:

The protection of Company resources against theft, wasteful use or use for personal interests and personal purposes is ensured by the interactive work of Company employees, specially established units within the Company for these purposes and

security units. In order to ensure efficient use of company resources, each employee must do the following (but not limited to):

- To do our best to prevent the wasteful use, theft and use of company resources for personal purposes,
- To use communication and communication facilities (phone, internet connection, e-mail, etc.) only for purposes related to Company business,
- To protect all electronic programs, data, contact information and written documents against access by third parties, in accordance with the legislation of the Republic of Turkey and within the framework of trade secret norms in force within the Company,
- Using company resources, employees and assets in accordance with the legislation.

The Company does not ignore the possibility that, in some cases, employees may have to use electronic communication facilities, office equipment and assigned authority vehicles for purposes other than Company business. In accordance with the legislation of the Republic of Turkey, the Company has the right to demand compensation from the employee for the damages suffered by the Company due to the contrary behavior regarding the above-mentioned.

4.7 Information and Documents:

4.7.1 Confidential Information:

Company employees may work with confidential information due to their position in the Company or their work. Disclosure of confidential information may harm the Company, other companies or be used against the Company by its competitors.

Company employees are obliged to protect confidential information, keep it confidential and fully comply with the rules regarding the receipt, storage and use of confidential information in force within the Company. In accordance with the legislation, the employee's obligation not to disclose confidential information continues after leaving the Company. Disclosure of commercial and other information that is contrary to legislation and confidentiality norms applicable within the Company may lead to legal liabilities for the Company and the employee making the disclosure. Employees are obliged to do their best to prevent unauthorized access, misuse or misuse of confidential information and to report such incidents immediately when they detect them. Company; It has the right to initiate criminal or administrative proceedings against employees or other persons who have confidential information and disclose this confidential information, because it causes or may cause harm to the Republic of Turkey, the Company, shareholders, other companies or other employees.

4.7.2 Disclosure of information by the company:

Since the parent company to which the company is affiliated is a public company, it must disclose information about its activities in accordance with the legislation. The Company has created all opportunities to disclose all information that needs to be disclosed in a timely manner. Any attempt to disclose false, misleading or incomplete information on behalf of the Company may cause serious harm to the Company and may result in prosecution under applicable laws.

4.8 Conflict of Interest:

The Company will implement a policy to prevent conflict between the interests of the Company's employees and the interests of the Company. Company employees are obliged to take the necessary precautions to prevent the emergence of personal interests that may negatively affect the efficiency and interests of the Company. Company employees are obliged to inform the Company in case of a conflict of interest or the possibility of a conflict.

4.8.1 Special situations in conflict of interest:

This Procedure does not identify all situations that may give rise to a conflict of interest. Some possible situations that may cause a conflict of interest to occur are listed below:

- Commercial activities of family members,
- The employee's own commercial activity,
- Existing financial/material interests in another organization that has a contractual relationship with the company,
- Working another job at the same time,
- If a family member of an employee is employed in another organization with which the Company has commercial relations, Company employees or their family members;
- If the party who will collaborate with the company is a representative, intermediary or has financial expectations from the party,
- Owns 1% or more (separately or jointly) of shares of a legal entity that is a party to, beneficiary of, intermediary or representative of a Company business,
- Is a member of the management team of a legal entity that is a party to, beneficiary of, intermediary or representative of a Company business, or is a member of the management team of an organization that manages such a legal organization. If a member of the family of a Company employee holds a position on the party that has a relationship with the Company, but this position does not have any impact on the relationship between the Company and the party, the decision, the execution of that job and the material conditions, a conflict of interest does not arise. In this Ethics Procedure, the following family members are included in the concept of family members;
- Spouse
- Mother / Father
- Children
- True and non-self siblings
- (As parents) Adoptive individuals and adopted children

Notwithstanding the foregoing, members of the Company's Governing Bodies and their family members who are not employees of the Company may have a significant financial interest or be a person affiliated with a contracting party, competitor or third party with whom the Company carries out or intends to conduct business activities. In this case, these members of the Company's Management Bodies are obliged to provide the following information to the Company's Board of Directors, the Company's Audit Committee and the Company Auditor;

- About legal entities that have 1 (one) percent or more voting shares (shares) either alone or together with the person(s) affiliated with them,
- About legal entities serving in management bodies,
- About known agreements that have occurred or have been proposed to which they may be interested parties.

In this case, contracts made with these persons must be approved by the Company's Board of Directors or at the Ordinary Shareholders' Meeting in accordance with the laws of the Republic of Turkey before being concluded. Even if it is not welcomed by the Company, performing other work at the same time does not constitute a violation of this Procedure.

However, any Company employee who starts such a job should be aware that a conflict of interest may arise during the performance of such a job. The Company hopes that the employee's interests as a result of his or her primary job within the Company will be carefully distinguished by the employee from his or her interests in his or her employment at another company. If the issue regarding the appointment of a Company employee as a member of the management body of another company is decided, the employee must notify his manager of the situation and obtain approval for his appointment as a member of the management body of the Company whose interests are or may conflict with the interests of the Company. This rule does not cover Company Board Members who are not Company employees.

4.8.2 Disclosure of information regarding conflict of interest:

The company requests full disclosure by its employees of any information regarding any situation that creates or may create a conflict of interest. In order to demonstrate that there is no conflict of interest, the employee may voluntarily submit information regarding the following to his/her immediate manager;

- About their income and property,
- About commercial activities carried out by family members,
- About their own commercial activities,
- About his/her financial/material interest in another organization,
- About working in another organization at the same time,
- About the employment of a family member in the Company. The employee's

manager must make a managerial decision to avoid a conflict of interest, based on information received from the Company employee. The company ensures that the information obtained from the employee is protected against illegal use, within the framework prescribed for the protection of commercially confidential information.

4.9 Practical Application of the Procedure:

4.9.1 Ethics Committee:

The Ethics Board is the committee consisting of members responsible for examining and resolving all notifications and complaints regarding violations of the ethical rules within the scope of this Code of Ethics Procedure. The Ethics Board consists of people in the following positions and works under the chairmanship of the General Manager:

President – General Manager

Member – Senior Manager of Human Resources and Administrative Affairs Member

Member – Legal Counsel

4.9.1.1 Duties of the Ethics Committee:

- To determine and develop the ethical rules to be taken as basis within the company and to update them in line with emerging needs,
- To ensure that ethical culture is established and widespread within the company,
- To follow up, examine and resolve all ethical issues,
- Ensuring the confidentiality of all ethical issues evaluated and keeping relevant information and documents confidential

4.9.2 Knowing/recognizing the procedure:

The Human Resources and Administrative Affairs Directorate is responsible for ensuring the following;

- Publishing and announcing this Procedure to existing employees and newly hired personnel, and introducing the norms (rules and criteria) it contains,
- Ethics training is given to every new employee. It is repeated annually for current employees.
- Informing employees about notification channels in case of violation of these norms,
- Informing employees about the changes within one month at the latest when possible changes in the procedure come into force,
- Checking information on procedural norms when evaluating company employees.

Once the Procedure is published within the company and announced to the employees, it is accepted that all company employees will read, understand and apply the rules contained in the Procedure. All new employees who will start working in the company are required to read this Procedure when starting work and have them sign the Ethical Rules Commitment stating that our Company's Ethical Rules Procedure has been accepted and will be implemented. This form is kept in the new employee's personnel file. Since the procedure is an open document, it can be posted in units, offices and meeting rooms and disseminated among employees. The procedure is also available on the Company's website.

4.9.3 Informing about violation of the procedure:

Each employee is responsible for knowing the rules in the Procedure, applying them and encouraging others to do so. All Managers are responsible for implementing the Procedure and creating the appropriate working atmosphere for its implementation. Managers are responsible for informing employees about the Procedure every six months and checking employees' knowledge about the Procedure once a year. If employees have any doubts about the correctness of their behavior, they can consult their managers or the unit responsible for such matters.

The Company is open to all comments regarding the Procedure and positive suggestions to improve them. Employees can reach the contact address and phone number given below, with their own identity or by keeping their identity anonymous,

to ask questions and be informed about the implementation or violation of the Procedure:

- Phone Number: 0545 353 0634
- E-mail: etik@ info@celikağmuhendislik.com
- Mail: info@celikağmuhendislik.com

If the employee applies with his/her own identity, the Company will ensure the necessary confidentiality within the framework of the implementation of the Procedure.

4.9.4 Supervision of violations of procedural rules:

Supervision and control of Procedure violations detected by employees or received information through communication channels are carried out by the unit working on this issue. The results of the study are transferred to the Ethics Committee to make a decision and evaluate the violation. The Company may take administrative and criminal action in case of violation of this Procedure or inappropriate behavior towards employees, in accordance with the laws of the Republic of Turkey and the norms and instructions in force within the Company.

5. UNION RIGHTS

Our staff have union rights and can become union members and participate in union activities if they wish.

6. SOCIAL RIGHTS OF OUR STAFF

In our company, all legal rights specified in the law numbered 4857 in the Republic of Turkey are applied without discrimination among personnel.