

Coşkunöz Holding Code of Business Ethics



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Dear Employees,

Coşkunöz Holding has been transformed into a world company with the right strategies since 1950 and has achieved many successes it carried to international platforms. Our values, which form the keystones of these successes, have guided all our activities to date and shaped our understanding of business ethics.

We believe that our sustainable success goals will be safe with a business environment where we will never compromise our ethical rules with the sense of responsibility we carry against our stakeholders. The business ethics approach adopted by Coşkunöz Holding and its affiliates was put into writing as “Coşkunöz Holding Code of Ethics” is published via the website in English and Turkish.

The principles and policies we have determined together with these rules, will ensure our relations to be honest, reliable, primarily human, and business-oriented behaviours in the relations of our group with customers, business partners, stakeholders and competitors.

In this context, it is among the priorities and primary responsibilities of Coşkunöz Holding and its affiliates to exhibit behaviours that comply with our code of ethics. In addition to Coşkunöz Holding and its subsidiaries' employees, all stakeholders are expected to comply with the Coşkunöz Holding Code of Ethics.

We trust you in acting with the understanding of adhering to the rules of business ethics, which constitute the keystones of our corporate culture, and to carry Coşkunöz Holding and its subsidiaries to more powerful points.

With our Love and Respect...

Oya COŞKUNÖZ AKTAŞ
Chairman of the Board
Coşkunöz Holding

A. AIM AND SCOPE OF THE ETHICS RULES

The Code of Ethics has been prepared for the employees of Coşkunöz* to determine their responsibilities to each other, to their business partners, to the society, to the people and institutions they work with and to the environment in accordance with the ethical rules and to adopt and implement these rules by all employees.

This Code of Ethics aims to increase the prestige of Coşkunöz's name in the national and international arena, to maintain its continuity and to instil the corporate culture to new generations.

The obligation to comply with the content of this Code of Conduct applies to all Coşkunöz Holding and its affiliates, particularly the members of the Board of Directors of Coşkunöz Holding Companies.

While complying with the code of ethics, each employee should review each incident in the framework of the Code of Ethics and ask the following basic questions about the subject situation, behaviour, or decision before taking action:

- Does this comply with the Code of Ethics, professional business rules or standards?
- Does this cause extra benefits or harm to others?
- Would I be bothered if someone else, did it?
- Can I explain this situation to others comfortably?

B. OUR PRINCIPLES AND VALUES

1. HONESTY AND RELIABILITY

- 1.1** Coşkunöz progresses in accordance with the principles of quality, excellence, sustainable success, accuracy, dignity, and diligence which are the basic values M. Kemal Coşkunöz has adopted since the establishment of the company.
- 1.2** Coşkunöz conducts all its activities in the light of these principles and acts in the framework of honesty, reliability and transparency while maintaining these fundamental values.

* Coşkunöz implicates Coşkunöz Holding and its cooperations.

- 1.3** Coşkunöz treats everyone with dignity and respect and provide equal employment opportunities and conditions based on the individual's ability to do the job without any discrimination based on; including but not limited to race, gender, age, religion, ethnicity, cultural background, nationality, disability, health information, union affiliation.

2. COMPLIANCE WITH LAWS

- 2.1** Coşkunöz employees conduct all their activities in Turkey and abroad within the framework of laws and international laws and practices and take care to do business with stakeholders operating in the same understanding.
- 2.2** Coşkunöz expects its stakeholders to adopt the perspective of reliability, honesty, quality, and dignity, in particular to observe and abide by the laws and regulations in force about their business lines.
- 2.3** Coşkunöz acts in accordance with all relevant laws in countries it operates and/or will operate and with International Conventions to which Republic of Turkey is a party.

3. HUMAN RIGHTS AND WORKING CONDITIONS

- 3.1** Coşkunöz employees value diversity and act precisely to create equal opportunities. They respect human rights in all business environments and areas of business.
- 3.2** Coşkunöz employees consider the diversity of their colleagues' religion, language, race, gender, and culture as a source of wealth for the company; they do not tolerate discrimination on this issue. In this context we, we provide an environment where all employees can have unlimited trust.
- 3.3** Coşkunöz values every employee and creates equal opportunity by distributing the opportunities offered in a fair manner. In recruitment, promotion and assignments, it takes eligibility and competence qualifications as a measure.
- 3.4** Coşkunöz does not allow an employee to exercise a hostile and/or immoral pressure on another employee and does not allow behaviours that can be called as psychological harassment or discrimination.
- 3.5** Coşkunöz Management takes care to create a working environment where employees can express their thoughts comfortably and feel themselves safe.
- 3.6** Coşkunöz does not tolerate any forms of modern slavery and forced labour, including but not limited to forced, bonded or compulsory labour and human trafficking. Coşkunöz employees are also expected to report any concerns regarding human rights violation, including modern slavery or human trafficking to our "Ethics Line".

- 3.7** Coşkunöz does not tolerate any child labour. We prevent all forms of child labour as protected by Turkish Labor Law and respect children' rights to development, play, and education. Coşkunöz also expects its stakeholders and suppliers to show the same sensitivity in this regard.
- 3.8** At Coşkunöz we respect and comply with applicable laws and collective bargaining agreements, on working and resting hours, including overtime working hours, as well as annual, sick, and parental leave, and all other rights that are protected by the Turkish Labor Law.
- 3.9** Coşkunöz provides wages and benefits that, as a minimum, comply with applicable laws and collective bargaining agreements.
- 3.10** Coşkunöz is an equal opportunity employer. We treat everyone with dignity and provide equal employment opportunities and conditions based on the individual's ability to do the job, we promote diversity and inclusion and provide equitable benefits and working conditions accommodating all categories of human diversity.
- 3.11** Coşkunöz supports freedom of association. Our employees are free to lawfully form, join or not join labour unions, bargain collectively, seek presentation and join worker's councils in accordance with local law and international conventions. Our employees are able to openly communicate and share ideas and concerns with management practises without fear, discrimination, or retaliation.

4. HEALTH AND SAFETY

- 4.1** Coşkunöz commits to creating a working environment in accordance with health and safety regulations to protect the health of its employees by acting with the principle of respect for its employees. Coşkunöz employees undertake to comply with the regulations and policies set forth by the Company regarding health and safety.
- 4.2** Employees in charge of health and safety act responsibly and avoid behaviours that may cause a danger to the workplace and colleagues even if they are not currently defined; they only keep goods and materials that are in compliance with law and regulations in the work environment.

5. RESPONSIBILITY FOR THE ENVIRONMENT

- 5.1** Coşkunöz employees take responsibility for the expansion of environmental awareness by adopting environmental policies as business practice.
- 5.2** Coşkunöz takes care to use environment-friendly technologies on the construction and environment applications, beyond laws and regulations.

- 5.3 To enable the transformation of our industry we make best of our ability to optimise and explore circular business models for the products we deliver, including our packaging, sourcing of minerals and materials, net zero supply network and logistics are all in accordance with internationally recognised circular economy principles.
- 5.4 Coşkunöz carefully and responsibly takes responsibility on biodiversity protection, water management, energy consumption and renewable energy.

6. SOCIAL RESPONSIBILITY

- 6.1 Coşkunöz takes part in projects that support the growth and development of the society in which it is located or provides reasonable support to such projects. Its focus of social responsibility is people and their education.

7. SUSTAINABLE SUCCESS

- 7.1 Coşkunöz employees acknowledge sustainable success and corporate reputation as an inseparable whole. Protecting and maintaining them are fundamental principles considered while doing business.
- 7.2 Product, service safety, quality and customer satisfaction are the priorities of Coşkunöz's vision. In this context, Coşkunöz employees' most important ethical responsibility is to provide production and services at Company standards with the aim of maintaining Coşkunöz's market leadership.

C. RULES

8. CORRECT USE OF COMPANY ASSETS

- 8.1 Any material or non-material value and information within Coşkunöz is accepted as company asset. Coşkunöz employees are obliged to use all kinds of assets offered within the Company in line with the purposes of the Company. Employees should protect their company assets against loss, damage, waste, and theft, and should not use the Company's assets in their own use for personal purposes other than for business purposes unless.
- 8.2 Coşkunöz employees document the patent, utility model and/or industrial design they developed while working for Coşkunöz as decided and acknowledge that they belong to Coşkunöz.

9. CONFIDENTIALITY OF INFORMATION

- 9.1** Coşkunöz employees use all written and/or non-written information, documents and techniques that are produced, acquired, and developed and that are in printed or electronic environment within Coşkunöz, only for the operations and interests of the Company.
- 9.2** Our employees do not share with third parties, take out of the company and acquire undeserved gain from the information which belongs to our Company or Coşkunöz's business partners and which are not open to public (employee information, inventions, contracts, strategy plans, merger and purchase information, financial data, product features, technical details, pricings, costings, processes, regulations, applications and instructions) or similar.
- 9.3** Our employees show the same sensitivity to the confidentiality of third-party information. We respect the privacy principles of our suppliers and customers. If the information and documents pertaining to our customers or suppliers need to be shared with third parties due to the way of work, we obtain prior written consent.

10. ACCURACY OF THE RECORDS

- 10.1** In accordance with the principle of honesty and transparency, we take care to ensure that all transactions are properly recorded in accordance with their actual nature, laws, and company rules, that the relevant data and reports are archived.
- 10.2** We comply with regulations and internal controls developed to maintain the reliability of all records.
- 10.3** In all matters that are financial or non-financial, but which may cause the company's commercial gain / loss, we fully comply with the creation of all records, books, and accounts nationally and in accordance with international regulations when needed. We ensure that everyone who provides financial services to Coşkunöz also observes this compliance.

11. PERSONAL CONFLICTS OF INTEREST

- 11.1** In line with the principle of honesty and reliability, Coşkunöz employees are required to put the Company's interests ahead. Employees therefore avoid access to situations that may affect their impartiality due to their personal interests.
- 11.2** Our employees cannot enter into relationships with our customers and suppliers that create/may create the opportunity for a personal benefit (such as unfair gain, borrowing/lending, share/partnership relationship, recruitment, etc.) for ourselves, relatives, and environment.

- 11.3** Our employees do not take part in the Coşkunöz recruitment decision process of their immediate environment or do not enter into a two-staged superior-subordinate relationship in order to prevent his/her personal interests conflict with the interests and principles of the Company. In the event that a person in his / her immediate environment works in a company that has a business relationship with Coşkunöz, he / she will not be involved in any decision process related to these companies and will inform his / her supervisor about his/her private relationship even if he has the responsibility or decision power in this operation.
- 11.4** Within the framework of the principles stated above, managers who are close relatives with the other party (parents, siblings, nephews/nieces, spouses, siblings of the spouse, parents of the spouse) are obliged to report this to the supervisor in writing. Continue the related purchases or sales in spite of this relationship is subject to the written permission of the superior. Failure to report means a violation of personal conflict of interest principle and means that there is a deriving personal benefits.

12. NON-INSTITUTIONAL WORK

- 12.1** Coşkunöz employees shall not work in any business for any wage or benefit, either officially or informally without the written permission of the company. Coşkunöz supports the voluntary work of its employees in social responsibility awareness.
- 12.2** Coşkunöz employees carry out their volunteer work in accordance with the relevant regulations in a way not to hinder the workflow.

13. RELATIONS WITH CUSTOMERS AND SUPPLIERS

- 13.1** In all customer and supplier relationships, our employees observe the Coşkunöz core values of honesty, reliability, and sustainable success.
- 13.2** Our employees do not engage in any business relationship with any customer or supplier that our company provides products or services in his/her private life, under whatever name, avoid any actions that would undermine the Company's image and interest.
- 13.3** Fair competition and anti-trust; competition laws are designed to promote vigorous competition, innovation, and efficiency in the marketplace, so consumers have access to the widest range and highest quality of products and services at the most favorable prices. Coşkunöz supports a competitive economy and prohibits illegal, anticompetitive activity.

13.4 As a global company based in Turkey, we take seriously our obligation to comply with Turkish law. We recognize the global reach and complexity of these laws and understand that their application may limit some of Coşkunöz's business activities. We follow our compliance processes and work with the company's trade compliance experts as needed when questions arise.

14. ACCEPTING AND GIVING GIFTS

14.1 Coşkunöz stands against corruption. All forms of corruption, including bribery are strictly prohibited. We do not pay, offer, or accept bribes or other improper advantages.

14.2 Our employees do not directly or indirectly accept or offer any goods, services, gifts, earnings or benefits directly or indirectly, whether economic or not, in our customer and supplier relationships that may affect our impartiality.

14.3 No interests are accepted or offered contrary to laws and social norms.

14.4 When hesitating to accept or give a gift, "Regulation on Accepting/ Giving Gifts and Other Hospitality Regulations for Travel and Payments" a senior manager or Ethics Committee are referred to according to circumstance.

14.5 Coşkunöz does not tolerate any anti-money laundering actions across their business.

15. SUPPLIER SELECTION

15.1 Our employees perform supplier selection and evaluations in an equal and fair manner through objective criteria, independent of personal relationships.

15.2 Providing products and services that are appropriate for Coşkunöz quality and reputation is considered as the main supplier assessment condition, no special interests are observed except for the Company's interests.

16. RELATIONS WITH PUBLIC OFFICIALS AND NGOS

16.1 In making business relations with public and NGO officials, all applicable legal regulations are taken into account in order to preserve our Coşkunöz core values; no aid in kind or in cash are made, which can be interpreted as payment for various rights that can be provided.

16.2 Since public officials may be subject to different laws and regulations in terms of giving or accepting gifts, information is asked for from his/her own manager or, if necessary, the Ethics Committee in order to obtain information about the subject during relations with public officials.

16.3 Coşkunöz Holding and its companies may be a member of the organizations deemed appropriate by the Board of Directors. They may donate within the scope of approval and budget to be received from the General Manager and / or Holding Senior Management and may support Coşkunöz employees in their individual membership in these organizations.

17. RELATIONS WITH POLITICAL PARTIES AND CLUBS

17.1 Coşkunöz is politically neutral. As a company, it helps no political party, politician, or politician candidate in kind or in cash, it does not take sides.

17.2 Coşkunöz employee cannot serve as a director in any political party and sports club, cannot make their propaganda.

18. RELATIONS WITH COMPETITORS

18.1 Coşkunöz is sensitive about acquiring information about competitors in compliance with ethical rules. For this reason, Coşkunöz encourages its employees to benefit from public information of their competitors with the idea of continuous development of the Company's operations.

18.2 Coşkunöz employees do not engage in illegal activities while gathering information about their competitors, and do not infringe the information security of their competitors in a manner that contradicts Coşkunöz's principal principles of honesty, entrepreneurship, and dignity.

19. RELATIONS WITH THE MEDIA AND THE SOCIAL MEDIA

19.1 Making statements and giving information to the media and social media about Coşkunöz Holding and its companies is provided and coordinated by the Corporate Communications Department.

19.2 Our employees cannot make any comments, declarations, or statements in the written, visual, and social media by using the name of the Company or the title of the Company in direct and indirect matters, with or without the permission of or without being assigned by the Company management.

D. RESPONSIBILITY OF COMPLIANCE WITH ETHICAL RULES AND NOTIFICATION OF VIOLATIONS

I. Our employees behave in accordance with these codes of ethics and inform the Ethics Committee about the violation of these rules.

II. If you have valid reasons to suspect violations of the company rules and / or Coşkunöz Holding Code of Ethics, report this information to the Ethics Committee or the Ethics Line as soon as possible.

III. Questions about ethics and any violations of ethics are notified to the following e-mail and telephone addresses.

- Report to Ethics Line e-mail...
coskunoz@etikhat.com
- Report to Ethics Line phone number...
+90 (212) 371 0 771
- Report on Ethics Line website...
www.remedetikhat.com.tr

User Name : coskunozetik

Password : 1968etik

- IV. Coşkunöz takes care of any notification of violation and misconduct on the Code of Ethics and takes the necessary decisions by examining the notifications meticulously.
- V. Coşkunöz appreciates the fact that its employees make a notification of any violation by acting freely and honestly. Therefore, employees of Coşkunöz report an ethical violation to the Human Resources, to a senior manager or to the Ethics Committee without being negatively affected and without any fear of retaliation due to the notification. Coşkunöz does not allow in any way any discrimination, harassment, lowering of seniority or threat against the person who notifies the violation. The Company takes all necessary measures to keep the person's identity and the information he/she sent confidential.



You may notify us by channels below.

 0 212 371 07 71 |  coskunoz@etikhat.com |  remedetikhat.com.tr