# SARILAR GROUP CODE OF ETHICS AND VALUES POLICY

## Purpose

The Code of Ethics and Values Policy has been created to establish the procedures and practices regarding ethical rules and values of Sarılar Group, and to ensure that all stakeholders of Sarılar Group comply with this policy.

## Scope

This policy applies equally to all stakeholders of Sarılar Group, including but not limited to employees, customers, suppliers, and subcontractors.

## Implementation

All stakeholders of Sarılar Group are expected to act in accordance with the principles outlined in this policy and report any violations of these principles to the Sarılar Group Ethics Committee via the email address etik@sarilar.com.tr or through their supervisors. Reports can be submitted anonymously if desired, thereby avoiding retaliation processes.

Sarılar Group employees confirm that they have read and understood this policy and accept the obligation to act in accordance with the rules established herein.

Sarılar Group takes a firm stance on matters of business ethics. The company adopts an ethics policy that includes the following issues:

## • Anti-Corruption

Sarılar Group enforces a zero-tolerance policy against all forms of corruption. Company employees shall not engage in any corrupt activities and must report any suspicion of corruption immediately.

## • Conflict of Interest

Employees must avoid situations that may create a conflict between the company’s interests and their personal interests. Any conflict of interest must be declared openly and transparently.

## • Anti-Money Laundering

Sarılar Group adopts a zero-tolerance policy against money laundering activities. The company conducts its financial transactions in accordance with the law and does not engage in any money laundering activities.

## • Information Security

Company employees are obligated to keep all business-related information confidential. Necessary precautions are taken to ensure information security, and full compliance with information security policies and procedures is maintained.

## • Anti-Fraud

Sarılar Group actively combats fraudulent activities. The company takes necessary steps in the event of suspected fraud and informs the relevant authorities.

## • Compliance with Competition

Sarılar Group adheres to the principles of fair competition and fully complies with competition law. The company promotes healthy competition and avoids behavior that does not comply with competition rules.

## • Compliance with Human Rights

Sarılar Group adopts respect and compliance with human rights as a fundamental principle in all its operations, ensuring a safe and fair working environment without discrimination and complying fully with national and international human rights regulations.

## SARILAR GROUP ETHICS VIOLATION REPORTING WORKFLOW DIAGRAM

The Sarılar Group Professional Ethics Compliance Workflow Chart is valid for all facilities and is implemented as shown in the diagram below.

