

ETHICS AND COMPLIANCE

1.1. OUR ETHICAL AND SOCIAL ADAPTATION POLICY

Our ethical and social adaptation policy comprises ethical standards supporting our values. Our ethical standards are mainly based on our responsibilities to our employees, customers, suppliers and competitors, but particularly based on our legal liabilities.

Corporate reputation is gained by fulfilling responsibilities. Any work of us would serve as a good example. For all of our relations, we always act in awareness of that we represent Enpay.

The people, experience and time are our most significant resources. It is our responsibility to develop and protect resources and evaluate them in line with our targets.

Enpay gives priority to protect all its employees, stakeholders including customers and suppliers, and lively life affected by the activities, and it shows due diligence to fulfill related responsibilities as needed.

1.1.1. Legal Liabilities:

We implement all of our existing operations and actions, inland and outland, in compliance with the applicable laws and international law, and we timely submit the correct, complete and understandable information to the regulatory authorities and agencies in the scope of authorization.

1.1.2. Responsibilities to the Employees:

We ensure the employees exercise their rights completely and properly. We approach to the employees honestly and fairly, and we commit a safe and healthy working environment without discrimination to them. We endeavor for ensuring personal development of the employees.

We ensure the maximum working hours as stipulated in the applicable laws are obeyed.

We do not employ anyone who is under 18.

We guarantee to pay minimum wage as stipulated by the applicable laws.

1.1.3. Responsibilities to Customers:

We work customer focused, and under comprehension to meet the demands and requirements of our customers in most accurate manner and as soon as possible. We deliver our products in time and under the conditions as we promised, and we approach to our customers with due respect, fairness and kindness. We guarantee the customer requirements.

1.1.4. Responsibilities to Suppliers:

We have a fair and respectful approach to our suppliers. We show due diligence to keep confidential the secret information of the natural persons and legal entities we cooperate with and of our business partners.

1.1.5. Responsibilities to Competitors:

We compete in comply with legal and ethical requirements in the international market and we avoid unfair competition.

1.1.6. Responsibilities to Environment, Community and Human:

In all our operations, particularly we avoid working which will damage to the environment, community and human. We act according to the applicable regulations in relation to the environmental protection. We provide continuous improvement in order to decrease environmental pollution and to protect environment.

1.2. Occupational Safety, Health and Environment

Enpay attaches importance to occupational safety and health of the employees and considers it as priority value. To this end, it acts according to the applicable laws to ensure a safe workplace. Enpay has already communicated its main policy for occupational safety to the employees under OH&S Policy and has have them adopted.

It provides employees with training to make sure that the occupational safety guidelines, and it controls and audits occupational safety practices on site.

Enpay identifies hazards under awareness of that it is responsible for the health and safety of the employees and takes necessary measures to prevent occupational diseases and accidents.

Enpay attaches a great importance to protect democracy, human rights, and environment, and in this regard, to raise awareness of the employees by training, and to eliminate crime and frauds. We do not give and accept any corruption or gifts with a value going beyond its purpose.

Our business operations are affected by the laws related to emissions particularly to the air, soil or water in environmental practices. For environmental health, the comprehensive employee training programs are provided on a continuous basis, and effective audits in relation to environment performance are conducted.

Codes of Implementation:

- Enpay believes in that all injuries, occupational diseases and work related and environmental accidents are avoidable, and aims at that they do not occur at all. It encourages the employees to place importance to the safe behaviors inside and outside the workplace. It provides the personal protective equipment which must be used by the employees according to the quality of each job and ensures they are used on site. It audits their adequacy to use in the internal audits and daily site tours.
- Enpay takes into consideration the environmental effects for each new infrastructure investment. It ensures all plant system and facilities and handling equipment are used safely. It is ready for emergency cases.
- Enpay aims at zero waste generation and protection of natural resources.
- Enpay provides the managers with necessary trainings on the health, occupational safety and environment as required. It makes sure that the managers manage the employees taking into account the trainings they have. Keeps records accordingly.

1.3. Employees

1.3.1. Adequacy and comfort of the working environment

Enpay provides a working environment which meets their needs, assures their health and safety, for all employees. It aims at increasing achievement, development and commitment of the employees owing to creating a working environment which is consistent with all relevant law and regulations, is healthy and safely.

Codes of Implementation:

- Enpay meets all legal requirements and complies with the legal legislations in the scope of its business operations.
- Enpay ensures that all employment-related practices such as human resources policies and practices, employment, job placement, promotion-transfer-rotation, termination of labor contract, recall, leave, salary, subsidiary payment, food, service and all other social benefits and training, but not limited thereto, are in place and implemented fairly.

1.3.2. Confidentiality Policy

Confidentiality and maintenance of corporate information:

It is strictly forbidden to share information related to Enpay with nobody including family members and friends.

These information covers pricing, customer details, any information which may have effect on decision for purchasing or not purchasing the product and those related to the corporate image.

Technical information, product and process data, pricing, marketing strategies, costs comprise corporate information that must be kept confidential.

It must be shown due diligence for that the confidentiality and proprietary information of our customers, personnel and other relevant natural persons and legal entities we cooperate with are protected and maintained duly.

As the said information is requested, they must be shared taking into consideration the requirements and official leaves.

Any employee resigned from Enpay is not allowed to take any confidential information and documents and projects acquired during employment time out of plant.

Confidentiality of Personal Information

Enpay keeps the personal information of the personnel, customers, suppliers and managers under protection inside facilities confidential. This information cannot be acquired, used or shared by the unauthorized personnel.

The privacy and private field of the employees are respected to ensure that the employees can work in an environment where their physical, sexual and emotional privacy rights are protected.

Codes of Implementation:

- The privacy and family life of all employees are respected.
- It is forbidden to hand over/distribute/receive the personal information even though they are recorded legally.
- The right of privacy in relation to use of computer, e-mail and internet is respected. On the other hand, in case of any violation of ethical rules, the electronic communication of the employees can be controlled. The corporate owned computers must be used for business purposes; the employees should not expect to have a privacy right when using corporate owned computers, voice mail and electronic mail accounts.
- The personal information belonging to the personnel that provide a basis and continuity of the business relation cannot be used out of purpose or scope and cannot be shared with the third persons without prior consents of the relevant person.
- The privacy and family life of all employees are respected.

Rules For Using Social Media

- Everybody is responsible for what they share and publish on online platforms.
- Should be clear that they do not represent Enpay and they only speak for themselves.
- Should include the below mentioned information in their personal profiles. "The opinions expressed on this website/account are personal, they do not represent ENPAY."
- Should not use ethnical, personal insults that cannot be accepted at ENPAY, furthermore they should be respectful other people's private lives and their views on delicate matters such as politics, religion.
- If you introduce yourself as an ENPAY employee, you should make sure the profile and content you share are acceptable for your colleagues and customers.
- Should not share any information, video, article or photograph belonging to ENPAY with third persons.
- Should not write in an offensive, distracting and abusive language.
- Our employees should not tag office, meeting contents, detail and places in social media.
- It is of importance to be careful with the language and expressions used in social media. Using and sharing discriminatory, harassing, disturbing, racist, sexual, ethnic, religious or physical expressions which are assaulting and insulting and mediate them might lead to serious legal

problems (e.g. sharing a text that might damage reputation of an institution or an individual on your Facebook wall or as a message on Twitter.)

- Enpay logos and trademarks that are not approved should not be used.

1.3.3. Anti-discrimination

In Enpay facilities, people who are from different race, gender, religion, have different skin color, different nationality, different age and views, and are disable work together in harmony. Any discrimination caused by the persons who are not employed in the plan including any employee, manager, advisor, visitor, customer, guest, good and service supplier in the facility is not indulged and tolerated.

When performing their works, the employees must respect for the individual rights and cultural differences.

Codes of Implementation:

It is strictly forbidden to exhibit behaviors supporting discrimination, and all verbal or non-verbal behaviors to the face of or behind the people back. Such behaviors may be as follows;

- Any comments on body, outlook or life style of anyone, considering the race, gender, nationality, religion or disability or any other characteristic included in the category of “protected characteristic”
- Any physical approach which is not wanted by the other party, any physical contact which is not taken kindly, proposal or touch
- Non-verbal annoying behaviors such as malicious look or staring which are sensed as unwanted behavior by the counter-party
- Showing or illustrating explicit or smutty graphics, comics, picture, photos or objects in the work place which are related to the race, gender, nationality, religion or disability or any other characteristic included in the category of “protected characteristic”
- Any statements or threats which are implying on that there is a connection among the employment status, promotion potential, salary or other activities related to the employment and associating them to each other, or are made so as to lead to such an implication logically

1.3.4. Actions to be taken against mobbing, harassment and verbal attacks

In our corporation, mobbing, harassment and verbal attacks are the unacceptable behaviors. If this case is encountered, following actions must be taken;

- Tell your manager all happenings and your experiences having based on concrete and certain events. Ask your manager what kind of a path you may take for that problem and follow the developments.
- If your manager is not able to find a solution even after a while and if the harassment is still continued, leave a written application into the “suggestion box” located in the human resources department and contact the Human Relations for necessary action.
- If you still continue to have the same problem after a while, refer to the internal lawyer.

1.3.5. Prevention of conflict of interest

We, as Enpay Corporation, together with all our employees, aim at staying away from relations and cases associated with potential or real conflict of interest. We do not gain personal benefit from the natural persons and legal entities with whom we have business relation personally, through our family or relatives, making use of our current duties and positions.

Codes of Implementation:

- The personal activities and interests of the employees should not conflict with responsibilities to Enpay.
- Please aware of all actual behaviors and attempts contrary to the corporation ethics in this scope and notify them to the management.

- These points of interests may be following; inform Enpay of any additional business or workplace you may have even though you are white collar personnel or worker
- If you have any relation with a customer, supplier and competitor, inform Enpay of any affinity, friendship, any business relation in the history.
- Inform any employees you have close friendship with and for whom you are in position to evaluate performance and task and to make appointment.
- Inform always your manager of any offer or gift which are contrary to the rules.
- It is strictly forbidden to make use of personal interests in all kind of supplier relations: otherwise it constitutes a cause to terminate the labor contract. Enpay requests the employees to display sensitivity to this end.

1.3.6. Accepting gift, entertainment/accommodation as guest and other special purpose applications

For their own interest, Enpay employees should not ask for gifts, financial profit or aid, accommodation, special discounts, commissions or discounts and should not accept offers that may affect their impartiality, judgment and actions.

Gifts from persons and institutions, with whom Enpay has commercial relationship, cannot be accepted, with the exception of gifts of which approximate value does not exceed 30 Euros.

Our employees should not accept gifts of cash or cash equivalents, including gift and discount vouchers, or borrow money from suppliers, consultants, competitors or customers.

Gifts with low monetary value or nominal value rather than monetary value, such as chocolates, flowers or promotional items, are not covered by this policy.

1.3.7. Relations with customers, suppliers and competitors

Relations with the competitors must be kept at the lowest level and except for official and legal notifications, information about corporation, costs, prices, business policies should never be given to the third persons.

When having an interview with a customer or supplier, communication must be carried out only in the scope of purchasing /selling product or services.

The employees and suppliers will not enter into discussions at all and will not ignore their requests and complaints. It is compulsory to refer to the directives of the top management.

Working based on confidence and cooperation is encouraged among all employees, suppliers, and the personnel employed by the supplier in the plant. Relations must be kept within the borders of standards specified in this document.

1.4. Protection of Intellectual Capital, Patent and Reproduction

Enpay keeps its technology and intellectual capital under protection.

Patent, reproduction rights, business title and name, trade secrets fall in the scope of intellectual capital.

All products, material, scientific method, software developed as a result of focusing on works under Enpay's roof fall also in the scope of intellectual capital and are property of Enpay.

Our employees must show due diligence for that the third persons and intellectual capital are not used out of purpose.

Simultaneously, the intellectual capital of suppliers and customers must also be respected and should not be reproduced or used without prior written consent of them.

1.5. Protection of Enpay Resources and Assets

All assets of Enpay must be used expediently. The improper usages can be following;

- Stealing or making them use by those who are not related to Enpay
- Using and making use without taking into consideration the using rules and conditions
- Failure to inform the corporation or customers when necessary or suppliers of the asset status or misinforming
- Using powers for individual benefits
- Using or making use Enpay assets out of purpose in collaboration with the other natural persons or legal entities
- Hiding work-related information including customer or supplier information

2. ETHICS PRACTICES

Enpay does not discriminate any corporate employees, supplier, and the employees employed by the suppliers in the plant based on conducting ethical standards.

Enpay expects all employees and suppliers to do their best to follow ethic standards.

2.1. Practices Accomplished To Manage Ethics

- Top management supports compliance with the ethics standards.
- Any behavior which is not complying with ethical standards must always be notified by any employee to the Human Resources Department. In case of necessity, personal identity data of the notifying person is kept confidential by Enpay.
- Compliance with ethical values is controlled.
- It is controlled if the ethical incompliance is caused by misunderstanding.
- Detections are provided based on the concrete data, events and objective evidences.
- Exceptional cases are taken into consideration.
- Minor failures arising even though works are tried to perform in compliance with the ethical rules are indulged under mutual understanding and by clarifying the matters.
- A manager who will be responsible for managing ethical values was appointed.
- Enpay hold meeting with the agenda of ethical standards and social adaptation compliance once a year at least in order to discuss in the Management's Review Meetings. In comply with the minutes of meeting, it addresses the relevant practices in the internal audits to audit on site. Thus, it ensures continuous development of ethical and social adaptation practices.

3. METHOD APPLIED IN CASE OF INCOMPLIANCE WITH THE ETHICAL STANDARDS

One of the following disciplinary actions is started if it is explicitly identified that any person does not comply with one or more ethical standards. The employees should inform the Human Resources Department if and when they ascertain any behavior which is not complying with the ethical standards even such behavior is exhibited by the managers. The "ethical incompliance suggestion box" is used to keep the notice confidential and to assure the employee in case of that the employee abstains from verbal notice.

The disciplinary actions are divided into four categories;

1. Verbal warning
2. Written warning
3. Refer to disciplinary committee
4. Termination of labor contract

The disciplinary actions can be taken by classifying the unethical behaviors. There are four categories;

a. Severe misbehavior: (e.g theft, corruption, conflict of interest, and behaviors misusing Enpay intellectual capital and resources, damaging customer relations, violating confidentiality policy)

b. Very serious misbehaviors: (e.g jeopardizing more than one person including him/herself in any issue, displaying flexible behaviors in implementation of policies without prior notice to top management, and any behaviors violating ethical standards and “Enpay internal regulations” and “business code of conducts”)

c. Unacceptable misbehaviors: (e.g behaviors jeopardizing occupational safety, health and environment, containing mobbing and verbal attack, encouraging discrimination and violating “business code of conducts”).

d. Behaviors causing disorder of working environment

3.1. Verbal Warning

Verbal warning is given by the manager of department to which the employee reports, or Human Resources and Management Development Department in the General Management, and Human Resources Manager in the other corporations. Both managers must inform each other about verbal warning given to the employee. Any verbal warning can be turned to a written warning for taking by the manager into consideration during performance evaluation of the employee. The d type behaviors are those that can be punished with verbal warning.

3.2. Written Warning

A written warning is given signing by the top manager of the department and the relevant human resources manager. The Ethics Committee can be involved in the written warning process.

Written warning is delivered face to face via document recording system after having discussed with the employee. Following written warning, the manager must decide on what kind of corrective actions should be taken by the employee in cooperation with the employees. The b and c type behaviors are those that can be punished with written warning.

3.3. Disciplinary Punishment

Actions are taken in accordance with the relevant legislation and with the policies and standards as specified in this business ethics manual. The a and b type behaviors are those that can be referred to the disciplinary committee.

3.4. Termination of Labor Contract

Actions are taken in accordance with the relevant legislation.

4. BUSINESS CODES OF CONDUCT

The following behaviors are those which may lead to that the employee is referred to the disciplinary committee and that the labor contract is directly terminated if required, and which are strictly forbidden to exhibit;

- Quarreling and treating at the work place
- Uttering humiliating language and using discriminating terms against the employees at the work place
- Exhibiting behaviors disordering working environment
- Carrying out sexual harassment and attack
- Taking anything with to the work place which is likely to damage to the safety of the other employees
- Absence which is not complying with legal boundaries
- Behaviors not complying with ethics standards
- Using any material, equipment or asset he/she is not authorized to use as to his/her occupation

- Theft
- Taking one or more than company assets or assets of the other employees out of plant without prior permission
- Using Enpay owned patent and information for any purpose other than business, taking them out of plant, giving or transferring them to the third persons
- Giving incorrect information in CV and in any other business related documents
- Give or accept a bribe
- Coming to the work place drunk
- Drinking alcohol and doing drug at the work place
- Gambling at the workplace and conniving gamble
- In addition to the aforementioned behaviors, any and all behaviors and practices stipulated in “Enpay Internal Regulations” are considered, implemented and followed up as business codes of conduct.