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1- GENERAL PRINCIPLES

1.1. Introduction

The Code of Ethical Conduct and Implementation Principles of Klimasan Klima Sanayi ve Ticaret A.Ş. ("Company") are a general guide to acceptable and appropriate behavior in the company and you are expected to comply with its content; however, it may not contain all the detailed information you will need during your employment. Since company policies are constantly reviewed and kept up to date, these rules may be changed or revised from time to time.

You should familiarize yourself with these rules so that you can recognize any suggestions or behaviors that may cause a violation in advance. All employees are responsible for their own behavior. Violations can lead to disciplinary actions, including termination and criminal penalties. There will be **absolutely no** retaliation for an employee who reports a violation or suspected violation in good faith.

As an employee of the company, your part; follow our policies and adhere to our rules as issued or modified.

As a signatory and supporter organization of the United Nations Global Compact (UN Global Compact), this document refers to the articles of the Sustainable Development Goals **5-Gender Equality, 8-Decent Work and Economic Growth, 10-Reducing Inequalities, 16-Peace, Justice and Strong Institutions of the Sustainable Development** Goals and our attitudes and efforts within the scope of the relevant goals are stated.

1.2. Purpose and Scope

The purpose of this Code of Ethical Conduct and Principles of Practice is to determine the values, principles and guidelines that shape **the behavior of all Company employees**, regardless of hierarchical order. This guiding document should be used as a professional and individual implementation tool so that employees can perform their duties according to the highest level of accuracy in all aspects of their actions, within the framework and scope of the current Laws, Rules and Regulations.

In terms of the ethical rules that all employees of the Company must pay attention to, comply with and respect, there are the laws of the country, the contracts, agreements and partnerships concluded by the Company, the protection of the Company's priority information and the principle of confidentiality related to this, among others.

The Company believes that every individual is important in terms of ensuring customer satisfaction, being innovative and the latest status of the Company, and this is one of the most important supports of its success and growth.

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2- VALUES

2.1. Our Mission

To create value for our customers by offering solutions that will protect and/or display food and beverage products in a healthy and delicious way at the most appropriate quality and price balance.

2.2. Our Vision

Constantly growing with new breakthroughs; To be a company that keeps the satisfaction of its customers, employees and shareholders at the highest level, is a leader in target markets in Turkey and in the world, has achieved business excellence, and creates value for society and the environment.

2.3. Our Values

Quality: Since the day we were founded, striving to achieve better is our most basic quality principle.

Customer Satisfaction: From the design of the product, production, sale, after-sales services and at every stage of all activities within our organization, we work to respond to the needs of our customers and create value for them.

People-Oriented: We see our employees as the biggest factor in ensuring the continuity of our organization's raison d'être and vision, protecting our values and transferring them to future generations, and sharing a common corporate culture, and we attach importance to our human resources.

Team Spirit: We share a participatory, system-adherent, corporate management approach that attaches importance to teamwork.

Collaboration: We attach importance to maintaining long-term relationships with our customers with a business partnership approach.

Globalization: We believe in the importance of quickly adapting to constantly developing technologies and commercial requirements in the world.

Environmental Awareness: We share the importance of constantly creating value for the "environment" with an understanding that will cost the whole society in all processes that make up our activities.

Ethical Values: We consider it a part of our ethical values to be an exemplary company with our business principles, to treat our employees equally and fairly in accordance with human rights and freedoms, and to always be open to different ideas.

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Our Ethical Values

*Reliability

Communicating openly and transparently,
Implementing the vision by conveying it consistently
Good management of the business and effective use of resources

*Equity (Fairness)

Non-discrimination and equal treatment,
Being objective in rewarding, promotion and recruitment,
Diversity and openness to different ideas

*Pride

Pride in your own work,
Teamwork and pride in business achievements

*Respect for Employees

Supporting their development by appreciating their achievements,
Ensuring the participation of employees in decisions,
Taking into account individual wishes and expectations

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3- ABOUT OUR RULES

The purpose of the Code of Conduct is to establish the values, principles and guidelines that shape the behavior of all Company employees, regardless of hierarchical order, and should be used as a professional and individual implementation tool so that employees can perform their duties according to the highest level of accuracy in all aspects of their actions, within the framework and scope of existing Laws, Rules and Regulations.

This document may not cover all potential situations that Company employees may encounter. The absence of specific guidance or instruction covering a particular situation does not prevent an employee from applying the highest ethical standards applicable to the situation.

If the employee has suspicions about a suspicious situation that may occur, first of all;

- To their managers and senior managers,
- Human Resources Department or Company Legal Counsel
- and/or the Company Ethics Hotline (etik@klimasan.com.tr) managed by the Company's Internal Audit Department.

3.1. Why Do Rules Exist?

Code of Conduct;

- An ethical attitude should be displayed by employees and relevant parties,
- Protecting company values and culture,
- Understanding the expectations of the company from its employees and understanding how they should follow if they need it,
- To ensure that business is carried out in accordance with the rules (policies, procedures, regulations, etc.) established by the Company and the legal obligations to which the Company is subject (local/global laws, regulations, standards, etc.)

It was created to help.

3.2. Who Must Follow the Rules?

The Code of Conduct applies to all employees of the Company and its subsidiaries, including the boards of directors, as well as its business partners, consultants, subcontractors and their employees. The Company requires all parties with which it cooperates to act in accordance with the Code of Conduct.

3.3. What are our expectations from our employees?

- Recognize the ethical and moral code of conduct adopted by the Company, act in accordance with them and take this document as their guide,
- Knowing, understanding and acting in accordance with the Company's environmental, occupational health and safety, quality and sustainability practices,

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- If they are aware of possible violations, they should report these issues through appropriate communication channels,
- To act in cooperation in case their statements are sought in any internal/external investigation or examination,
- To represent the Company at all times in accordance with the rules of conduct and Company values,
- Supporting third parties in ensuring that they act in accordance with the code of ethical conduct

3.4. What are the Behaviors and Responsibilities Expected from Managers?

- Recognize the ethical and moral code of conduct adopted by the Company, act in accordance with them and take this document as their guide,
- Encouraging employees to create and develop the ethical culture targeted by the Company,
- To understand the violation notifications conveyed to them by the employees and to make directions or guide them to make the necessary investigations,
- Creating an environment where their employees can express their ideas comfortably,
- To act in accordance with the code of conduct and relevant Company rules when evaluating employees,
- Not directing their employees in a way that violates the rules of ethical behavior in any way,
- Not allowing employees to violate the code of ethical conduct,
- In the event of a violation notification, they should not interfere with the employees who provide information in the investigation, they should not retaliate and they should protect the confidentiality of the investigation

3.5. What are the Behaviors and Responsibilities Expected from Our Business Partners?

- Recognize the ethical and moral code of conduct adopted by the Company, act in accordance with them and take this document as their guide,
- Acting in accordance with local/global legal obligations in the regions where they operate,
- To comply with the obligations they have undertaken such as contracts/specifications etc. regarding the works they have done with the company,
- To comply with ethical rules/values,
- Comply with legal regulations on employee health and environmentally friendly practices, set targets for development and encourage continuous improvement of health and safety performance by promoting best practices,
- To stay away from all kinds of human rights abuses such as child labor, human trafficking, forced labor, etc., and to take measures to prevent them,
- To stay away from activities such as bribery, corruption, money laundering, terrorist financing, etc., and to act in accordance with local and global laws/regulations on these and similar issues,
- To protect all kinds of documents, records, correspondence, information and transactions related to the business obtained during the commercial activities with the Company,
- Protect all applicable data regarding the processing, transmission, or disclosure of such data and information, and comply with information security laws and regulatory requirements

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3.6. *Commercial Product Sales to Personnel

Commercial products can be sold to its employees within the company following the application. Details regarding the said application are detailed in the TAL-IKY-036 Personnel Commercial Product Sales Instruction, and changes, announcements and information on the subject are made to the employees via e-mail and SMS. Our employees can apply to the Human Resources Department based on the model price information specified in the periodic announcements regarding the models in stock.

4- DOING THE RIGHT THING

4.1. When Should You Raise Your Voice?

In the event that something unsafe, unethical or potentially harmful is seen, all employees have the responsibility to raise their voices in a way that does not contain insults within the limits of the law. Whether there is a problem, need help, or raise a concern, there are several options.

4.2. Ways to Raise Your Voice

It is important to follow the steps below in order.

- 1- If you can talk to your department manager **about your concern**, they should be contacted.
- 2- If you are unable to talk to your line manager or if there is a concern directly related to him/her, the **situation can be discussed with** another manager in your team.
- 3- If it is not possible to meet with any manager from the team, the **subject can be transferred to the supporting departments of** the Company's Human Resources and Legal Counsel.
- 4- If you think that the options described above are not sufficient, you **should contact the** "Klimasan Ethics Hotline", **which is managed by the** Internal Audit Department, **which reports directly to** the Company's Board of Directors/Audit Committee.

4.3. *Klimasan Ethics Line

The Company has an "Ethics Hotline" application **for the use of all Company employees**. Klimasan Ethics Line is a communication platform created with the understanding of "one piece of information can change everything" and where employees can freely make their ethical statements. The "KEYS-KP-009 Hotline Procedure", which regulates how notifications regarding violations should be made, has been established and the relevant document **has been approved by the Company's** Audit Committee, Chairman of the Board of Directors **and** CEO of Metalfrio.

The process regarding notifications is **centrally managed by the** Internal Audit Department.

Purpose of the Ethics Hotline

To establish communication channels that will provide notification of any situation that may occur against the company and **to ensure that the notifications made are handled in** the most professional **and** impartial manner.

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What Notifications Are Made to the Ethics Hotline?

Notifications can be made to the Ethics Hotline both anonymously and anonymously. Ethics Hotline;

- Contrary to all applicable laws and internal legislation,
- Contrary to the current accounting practices, regulations, procedures and principles,
- Damaging the internal control environment,
- Contradicting the Company's procedures and instructions,
- Including reputational risk, involving the risk of material and/or moral loss for the Company,
- Including all other serious risks, bribery, corruption, theft, forgery of documents, conflicts of interest, confidentiality violations,
- Contrary to the code of conduct addressed in the Klimasan Code of Ethical Conduct Document

transactions, actions and any situation that may occur against the company. Notices may be about any party doing business on behalf of the Company; It can also be made about any manager, employee, statutory auditor, business partner, customer, supplier, consultant, external auditor, institution or government authority.

Which Issues Are Excluded from the Scope of the Ethics Hotline?

- Complaints about wages, salaries and the promotion process,
- Misunderstandings between colleagues,
- Non-working equipment,
- Other minor issues such as smoking, clothing,
- Other issues not covered in the Ethics Hotline Policy

However, it is not a notification of an ethical violation, but the workflow specified in the **Suggestion Evaluation System Instruction** should be followed for suggestive issues in administrative or technical matters.

Key Elements of the Ethics Hotline

- **Maintaining high standards such as confidentiality and non-retaliation**
- Handling all information in the most **professional** and **impartial** manner
- Implementing the necessary procedures for the evaluation and resolution of the employee notification and/or making the necessary directions for its implementation

On the other hand, if it is confirmed that the person transferring the information **is in bad faith** and the notification is revealed to be unfounded **as a result of the investigations**, the Internal Audit Department may make a recommendation to the Human Resources Department of the Company on the action to be taken against the relevant person.

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How to Report to the Ethics Hotline?

Any violation can be reported using any of the following communication channels:

- **E-Mail:** For the notifications to be made, an e-mail address has been established for the etik@klimasan.com.tr (Klimasan Ethics Line), which is only accessible to the Internal Audit Department.
- **Phone:** Internal Audit Department "+90 236 236 22 33 / Ext: 605"
- **Mail:** On behalf of the "Internal Audit Department", "Klimasan Klima Sanayi ve Ticaret A.Ş. Manisa IP 1. Section Keçiliköy OSB Mahallesi Cumhuriyet Caddesi No:1 45030 Yunussemre / Manisa – Turkey".

Operation of the Process Regarding Notifications to the Ethics Hotline

- Every employee of the Company has the right and responsibility **to report any situation that may occur against the Company mentioned above.**
- All notifications will be evaluated in **absolute confidentiality** under all circumstances. It is the responsibility of the Audit Committee **(the Committee that also carries out the activities of the Ethics Committee)** to keep all matters confidential.
- Both internal and external e-mails can be sent to **the above-mentioned electronic communication address.**
- Reports **can also be made completely anonymously, without including name and contact information.**
- All notifications sent are recorded with sequence numbers and regularly reported to the Board of Directors by the Internal Audit Department through the Audit Committee.
- In cases where the subject **is investigated in detail**, extra measures are taken **regarding possible risks** or an examination/investigation is required, the issue is brought to the agenda of the Board of Directors by the Audit Committee and the action to be taken is determined.
- The examinations carried out by the Internal Audit Department in line with the decision of the Board of Directors are followed by the Audit Committee.
- The final report prepared by the Internal Audit Department is brought to the agenda of the Board of Directors and a decision is taken on the subject.
- Audit Committee; It has the authority and responsibility to follow up the results on the subject, to monitor the measures taken and the actions taken by the Senior Management and the Executive Boards.

4.4. Protection of Employees

All notifications submitted to the Audit Committee and/or the Internal Audit Department **will be evaluated with the utmost confidentiality.** With this confidentiality, it is aimed to protect the reputation of both the employee, the Company and the shareholders.

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It is expected that the notifications made by the employees regarding any situation that may occur against the company mentioned above **will be made as a result of a well-intentioned, honest and professional** conscientious evaluation.

The **protection of the reporting employee** and the **confidentiality of the information** are the responsibility of the Audit Committee. Necessary measures will also be taken by the Senior Management in these matters. Everyone who reports to the Ethics Hotline/Audit Committee is under the protection of the Audit Committee due to these reports, **and they cannot be subjected to behaviors such as pressure, discrimination, mobbing, and are protected against retaliation.**

4.5. Sanctions

Violators of the Company Code of Conduct, policies and procedures **will be subject** to various disciplinary sanctions, up to and including being asked to leave the job if necessary.

Disciplinary sanctions will also be applied to those who approve, direct or have knowledge of inappropriate behavior and acts that cause breaking the rules but do not make the necessary notification appropriately . In addition, those who behave negatively towards those who make any complaints and notifications or assist during the investigation are also **not tolerated**.

5- CODE OF ETHICAL CONDUCT

5.1. Relations with State Bodies

Legal and regulatory orders applicable to all judicial bodies with which the company operates must be complied with. All employees are obliged to be aware of potential hazards and to have sufficient knowledge of the laws and orders relevant to their duties in order to know when legal advice is required.

Especially those who work in relations with public officials must adhere to the highest standards of business ethics. Employees may not offer, offer or demand any special behavior, privilege or promise of future value/gain in return for anything of economic value, directly or indirectly.

*From company employees;

- When communicating with the state and public organs, to behave in accordance with the Klimasan Code of Ethical Conduct,
- To act cooperatively and conciliatory in their communication with the state and public organs,
- It expects them to inform and involve their manager(s) in the processes and transactions carried out with the state and public bodies.

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5.2. Compliance with Local / Global Rules and Laws

Company operations/employees are subject to the laws of **many countries and jurisdictions around the world, especially Turkey**. Within the scope of international trade, the relevant rules and ethical values must be complied with, respecting the values, traditions, language, religion and race, laws and obligations of partner countries. If an action is prevented by ethical behavior or law, the relevant action should not be taken.

In addition, employees are expected to follow up-to-date information on both the Company's policies and their roles/responsibilities regarding legal obligations and to exhibit appropriate behaviors.

On the other hand, rules, laws or traditions announced by any state or legislative body may differ from the Company's ethical values/local laws. In case of similar situations and if the employee suspects that there is a violation of ethical values, the **Company Legal Counsel** should be consulted before taking any action.

*From company employees;

- First of all, to follow and act in accordance with local laws, laws, regulations, regulations and sanctions related to the field of work and other disciplines in which it is involved; and then to follow, recognize, respect and act in accordance with the laws, laws, regulations, regulations and sanctions of the country with which they engage in commercial activities or communication,
- With the awareness that local legal requirements are equally important to the legal requirements of the country where commercial activities are carried out; in any contradictory situation, they expect them to inform their managers and Legal Counsel and to request legal consultancy services when necessary in order to act in the most appropriate way.

5.3. Relations with Non-Governmental Organizations

The company cooperates with associations, foundations or other non-governmental organizations that comply with the law and have a transparent attitude about their activities. In addition to these institutions and organizations, it can also develop projects with various legitimate organizations such as student societies, undertake sponsorships and make donations in this context.

Employees can take part in non-governmental organizations and charitable associations outside the Company/represent the Company. While performing these duties, employees are obliged to understand and apply the applicable laws and to carry out all their communications in accordance with the framework determined by these laws.

*From company employees;

- To notify the Legal Counsel if the institution, organization, association or formation engaged in voluntary work makes material and/or moral requests at any stage of the cooperation, outside the scope of the work,

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- Any institution, organization, association or formation represented by the Company to act in accordance with the Klimasan Code of Ethical Conduct, respecting the data privacy of the Company, and protecting and glorifying the brand perception,
- With the awareness of social responsibility; It expects them to support the work of the institution, organization, association or formation that coincides with the mission, vision and values of the Company, to set an example for support, and to provide feedback and guidance to the Human Resources Department when necessary.

5.4. Relations with the press

Only persons with full authority can give written or oral presentations, interviews or information to the press regarding the company.

*From company employees;

- When communicating with the press organs, to behave in accordance with the Klimasan Code of Ethical Conduct and in an addressed manner,
- It expects them to avoid any attitude that will jeopardize the Company's data confidentiality, information security and integrity.

5.5. Public relations

The company expects its employees to devote themselves to acting fairly towards customers, suppliers, competitors and other employees by using common sense, respect and ethical values in all situations. When communicating with the local and/or global community through the press, non-governmental organization, social responsibility project, Human Resources process, etc., in any written or electronic way, it is necessary to have an honest and fair attitude without causing information security violations.

*From company employees;

- While communicating with the local and/or global community, they expect them to act in accordance with the Klimasan Code of Ethical Conduct and in an addressed manner within the scope of transparency and accountability approach in any entity they represent the Company.

5.6. Relations with Customers and Suppliers

Business transactions should only be made in the interests of the company. No employee may directly or indirectly benefit from any sales, purchases, or other company activities using his/her position as an employee. Employees should avoid situations that would lead to a conflict or conflict between responsibility to the company and individual interest.

*From company employees;

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- While communicating with customers, suppliers and business partners; To act in accordance with the Klimasan Code of Ethical Conduct and in an addressed manner,
- Not to serve as any employee, manager, employee or consultant who deals with persons or organizations that do or try to do business with the Company or make suggestions regarding such business,
- Not to have any interest in the Company's competitors or any organization that does or wants to do business with the company,
- Not have a direct or indirect personal interest in any business transaction with the Company (this does not include the products and services purchased by the employee as a consumer and the fact that the interest arises from the employee's relationship or the obligation of the shareholder holder),
- Not to provide communication or information services or equipment, directly or indirectly, or as an intermediary in a way that would cast doubt on the impartiality or integrity of the Company,
- To treat all customers, suppliers and business partners of the Company fairly and honestly,
- To increase customer satisfaction and experience by keeping the product and service quality at the highest level and by doing the necessary work to keep it,
- Expecting the Company's approach to customer satisfaction and product/service quality to be adopted by all suppliers and business partners, and expecting the same dedication from them,
- To make evaluations in accordance with basic values and business ethics by showing the necessary care in supplier selection and evaluation processes; to choose suppliers who act in accordance with these values,
- Observe the confidentiality of commercial information and use it only for legal transactions; It expects them to remain within the framework of necessary and secure information sharing by making sure that communication on written or verbal platforms such as tenders, contracts, meetings is accurate and truthful.

5.7. Fair Competition

The company supports competition on the basis of quality, service and price. The company carries out all its work honestly, directly and fairly. It is the Company's most basic expectation to work in accordance with anti-trust laws and the Company's principle of fair competition.

*From company employees;

- Never discuss an issue directly related to the competition between the company and the competitor (such as sales fees, marketing strategies, market shares, sales principles) with competitors,
- Never make an agreement with a competitor to limit competition by fixing prices, sharing markets and/or in other ways,
- Never insist on the purchase and/or promotion of a product or service that they do not want to customers,
- Never to be involved in industrial espionage or commercial espionage,

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- To behave honestly, accurately and in accordance with the Klimasan Code of Ethical Conduct and in an addressed manner in all their relations with customers,
- It expects them to accurately represent the quality, features and availability of the Company's products and services.

5.8. Internal Competition

Similar to competition between companies, it is in the nature of business life and working conditions that there is a competitive environment among employees for continuous development. With this awareness, the Company offers its employees opportunities such as promotion, position change, department change, specialization and wants its employees to recognize the rights of each other and to act in accordance with business ethics in a fair competitive environment while competing for these opportunities.

*From company employees;

- It expects them to avoid unfair competition while competing within the company, to act within the framework of ethical rules by observing fair competition conditions, and to act in accordance with the Klimasan Code of Ethical Conduct and in an addressed manner during the promotion or position change in question.

5.9. Anti-Bribery and Anti-Corruption

The Company has absolutely no tolerance for bribery and corruption, so it is very important that employees adopt fair competition practices. The Company does not offer, pay, accept bribes or commissions for any purpose, either directly or through a third party.

*From company employees;

- Not to make, offer or request facilitation payments; to notify their managers, Human Resources Department or Ethics Hotline if offered to them,
- In cases that may constitute a violation caused by suppliers, they should notify the Legal Counsel, managers, Human Resources Department or Ethics Hotline for the evaluation of the commercial partnership,
- Ensure that all sponsorships and donations are duly approved and paid for in accordance with their purpose,
- They expect them to comply with anti-bribery and anti-corruption laws and the Company's principles and procedures that prevent bribery and corruption.

5.10. Harassment-Free Working Environment

Harassment and abuse in any form is not condoned by the Company. Harassment; It can take many forms such as verbal expressions, physical approach, psychological pressure or visual display. Offensive, defamatory, discriminatory actions are considered within this scope.

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All types of sexual harassment are also included in this scope. Physical, sexual discrimination and harassment, racist, psychological or verbal harassment, inappropriate and humiliating, sexist jokes and discourses, physical or verbal violence and any **mobbing attempts** are not tolerated.

Situations such as feedback, objections and criticism should always be **done in an appropriate and respectful manner**. Employees are expected to act by taking into account cultural differences and sensitivities during all periods they are in contact with other employees.

*From company employees;

- To be aware of the Company's attitude towards all forms of harassment, to provide feedback to the Human Resources Department, the Ethics Hotline or the managers in case of any witness or suspicion that this attitude has been violated,
- For feedback, they should take into account the "Doing the Right Thing" section specified in the document,
- Recognizing that every report is of high importance and that firm actions will be taken, it expects them to never remain silent on their own behalf or on behalf of any other employee, knowing that they are safe and protected by the Company.

5.11. Respecting Differences

The Company respects all kinds of differences regardless of religion, language, race, gender, sexual orientation, age, political orientation or marital status, and operates with this understanding in the entire value chain/business discipline. The principle of equality in working conditions has been adopted throughout the Company.

*From company employees;

- While communicating with all internal and external stakeholders, to act in accordance with the Klimasan Code of Ethical Conduct and in an addressed manner,
- To behave respectfully, measuredly and politely towards all internal and external stakeholders with whom they work or communicate,
- They should never behave disrespectfully, bullying, intimidating, offensive or malicious, and when they encounter a violation in question, they should report in accordance with the instructions in the "Doing the Right Thing" section specified in the document,
- Managers and the Human Resources Department are expected to make decisions about the recruitment, selection and development of employees based on impartial criteria such as qualifications, skills, merit and experience, and to ensure that no differences are decisive in employment, rights and internal approach.

In line with the promotion and career development policies outlined by the company in general, no discrimination, especially sexual discrimination, is acceptable for a well-deserved promotion. This policy of the Company is guaranteed by the "Klimasan Recruitment Policy".

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5.12. Conflict of Interest

There are many situations that can lead to conflicts of interest in many areas of business life. The most common are accepting gifts from suppliers, working for another company, owning another company or a significant part of the business, close or family relationships with external suppliers, and communications with competitors. A potential conflict of interest arises for employees who make decisions in their jobs that can offer privileges to a customer in exchange for themselves or anything that benefits their friends and family. Such situations may disrupt the employee's ability to make decisions that are only in the interest of the Company. The company stays away from relationships, influences, or activities that undermine its ability to make fair and impartial decisions in the conduct of its business.

*From company employees;

- When they encounter a situation that may cause personal interest or benefit, they should act in accordance with the Klimasan Code of Ethical Conduct and in an addressed manner and take the document as a guide,
- If it is thought that there is or may be a conflict of interest, they report this situation to the Human Resources Department, a senior manager or the Ethics Hotline,
- Never use non-public information for personal gain or benefit, or transmit such information to another person (inside or outside the company) who does not have a legal requirement,
- Not to engage in any sharing, close relationship, agreement or dialogue with any supplier and/or customer for personal gain or benefit that may cause harm to the Company; It expects to act with the awareness that this situation also applies to family members or close friends.

5.13. Information Security and Confidentiality of Personal & Company Information

Care should be taken to protect **personal, Company, and/or 3rd party** information, **encrypt confidential or proprietary information when handling it, and** to share it only with authorized persons.

Personal information of employees and business partners is processed to the extent permitted by legislation in order to improve company activities. Employees responsible for processing personal data; to act in accordance with the Company's corporate policies, especially the legislation on the protection of personal data, to collect, use and process this information only for legitimate business purposes, to obtain consent from individuals as required by the relevant legislation, to correct incorrect information when requested, to keep personal data up-to-date by respecting individual legal rights, to limit access to information to those authorized to see this information, and to process personal data **.They are obliged to keep it confidential and secure.** It is forbidden to share this information with people who are not authorized and need to know the information.

*From company employees;

- To act in accordance with both the legislation and the rules determined by the Company regarding information security, to report any concerns regarding information breaches to the Company's

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Information Technologies Department without wasting time; in cases where it is not known what to do, to take this document as a reference and consult the Company's Legal Counsel,

- To treat all internal and external stakeholders of the Company with respect regarding the confidentiality and protection of personal information,
- Create, record, process, retain, and transfer personal information only in accordance with applicable law,
- Unless the disclosure of personal information complies with applicable laws and Company policies, they expect them not to access or disclose personal and/or Company data and information to anyone inside or outside the organization.

5.14. Insider Trading

It should be known that trying to obtain any commercial benefit, including directly or indirectly trading shares from stock exchanges, by using any confidential information belonging to the Company or giving it to third parties, is a legal offense (in the nature of insider trading), including but not limited to the Capital Markets Law (in the nature of insider trading), and this should never be attempted.

*From company employees;

- Never take out confidential information and documents and works such as projects and regulations that they have due to their duties when leaving the Company and/or during their employment,
- Not to perceive the personal and/or corporate information and data of the Company or any of the Company's stakeholders as a commercial element in any way and not to see them as a commercial element, and to act with the awareness of the sanctions that may be applied in case of violations,
- They expect them to act with the awareness that information trafficking is a legal crime and to report any violation concerns to their managers, Human Resources Department or Ethics Hotline.

5.15. Obtaining External Business

Acquiring external business may contradict the interests and interests of the Company in many respects. In such cases, employees should not acquire a job outside the Company in any way, taking into account the Company's understanding of "Conflict of Interest" and the purposes of this document, prioritizing the interests of the Company, as it may create information security and/or conflict of interest.

5.16. Recruitment of Relatives

As addressed in the Klimasan Recruitment Policy, the relatives of the employees are not hired in the Company on the grounds that they may create a conflict of interest. In order to prevent the conflict of interest, the Company is obliged to carry out the process with care and attention.

*From company employees;

- As stated in the Klimasan Recruitment Policy, they act with the awareness of the attitude and approach regarding the recruitment of relatives,

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- If a family member works for a customer, supplier or subcontractor with whom Klimasan cooperates or will cooperate, or in an official institution that has the potential to affect Klimasan's activities, it is expected to report this situation to the Internal Audit Department, Legal Department or Human Resources Department and submit it to the Company's evaluation.

5.17. Gifts and Entertainment

Under no circumstances should gifts or **hospitality** be accepted that may influence the employee's decisions . In particular, employees should avoid benefits or benefits from suppliers that would normally cause them to give privileges to that supplier.

It is a violation of the rule for an employee to request or encourage a good or service from a supplier, regardless of its value, no matter how small. Suppliers can only maintain their confidence in the Company's impartiality and integrity if all employees seriously observe this guideline.

Notification of Gifts: An employee who unintentionally receives a gift that is prohibited by this directory must immediately notify their manager in writing and return the gift to the giver or notify the Company's Human Resources Department for giving to nonprofit organizations.

Discounts: An employee can only accept discounts when the supplier or customer purchases their products individually if these discounts do not affect the company's purchase price and are generally offered to others who have a similar business relationship with the supplier or customer.

Business Meetings: Hospitality or services offered by a supplier or customer may be accepted by an employee if they are related to a business meeting and the customer or supplier offers them to others as a normal part of the business. Examples of such hospitality or services are; transportation from or to the supplier or customer's workplace, hospitality places, accommodation at the supplier's or customer's workplace, and business dinners during the visit of business visitors to the customer's or supplier's place. Services should be of the type normally used by company employees and compatible with the company's expense accounting.

*From company employees;

- Expect an existing or potential customer or supplier not to request or accept compensation, advances, gifts (other than financial institutions on the same basis as customers), hospitality or other gifts in excess of the trace price or at a rate that the employee cannot meet in normal expense accounting procedures.

5.18. Occupational Health & Safety

The company prioritizes the health and safety of its employees, business partners, subcontractors, suppliers, customers and the community in which it operates . In this context, it takes measures to provide healthy and safe working conditions to its employees and to achieve the goal of "Zero Accident".

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Company; Applies the requirements of ISO 45001 Occupational Health and Safety Management System at every stage of the organization and value chain; expects all relevant stakeholders to take care of their own and each other's health and safety, prioritize and act accordingly.

*From company employees;

- To use personal protective equipment (PPE) in operational areas,
- They always work in an environment where health and safety conditions are provided; stop working in a working environment that is considered unsafe and notify the Occupational Health and Safety Team,
- To participate in the planned information and awareness trainings, to request training if they think they do not have sufficient knowledge and competence,
- To report the accidents that have occurred or may occur, thus to play a supporting role in eliminating the risk or non-conformity and taking lessons from them,
- It expects them to work in harmony with the Occupational Health and Safety Team and to cooperate in order to take the necessary action in the identified risk situations.

5.19. Environmental Sustainability

The company acts in all its activities **within the framework** of the principle of social responsibility **and in accordance with the provisions of environmental legislation**. It determines the company procedures to be followed in the matter and ensures that its employees comply with them. Employees are obliged to comply with the company's policies and procedures regarding environmental protection and to report violations in this regard to their managers as soon as possible. All stakeholders are expected to continue their existence with the same care and sense of responsibility, in accordance with environmental laws and regulations.

*From company employees;

- To fulfill the necessary duties and responsibilities for the continuity of compliance with legal environmental legislation,
- To act consciously on efficient consumption of natural resources, energy saving, emission reduction, biodiversity,
- To show the necessary dedication in order for the company to achieve its goals within the scope of environmental sustainability and to successfully complete the studies and projects carried out,
- In order to live and maintain a clean environment, to ensure waste separation at the source, to support waste reduction efforts and to act with the awareness of recycling,
- It expects them to participate in the planned information and awareness trainings and to request training if they think they do not have sufficient knowledge and competence.

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KLIMASAN CODE OF ETHICAL CONDUCT and APPLICATION PRINCIPLES RECOGNITION FORM

I declare and undertake that I have read and understood all the articles of the Code of Ethical Conduct and Implementation Principles Document and that I accept that I will comply with the specified code of conduct in accordance with the legal legislation of the Republic of Turkey and that I will immediately make any legal notification regarding this issue to the Human Resources, internal audit, legal units and ethics hotline.

Employee's Name Surname:

Registration Number:

History:

Signature:

This page is prepared in two copies. A copy is kept in the employee's registry file.