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1.0 PURPOSE

Our company has implemented measures to employ specialized personnel who will ensure competitive advantage nationally and internationally. We maintain a reputation of professionalism, adequacy, honesty, and fairness among our employees, business partners, and customers, and we diligently preserve this reputation. Providing and sustaining a fair working environment is one of our top priorities. We adhere to all legal regulations in our business processes, prepared in accordance with the United Nations Universal Declaration of Human Rights. Creating healthy and safe working environments for our employees is our fundamental duty. We believe that Respect, Understanding, and Trust in our work relationships create a peaceful work atmosphere that influences our employees' sincere commitment and success in their professional lives.

2.0 SCOPE

The KUZUFLEX Code of Ethics described in this document applies to all KUZUFLEX employees, Board Members, Suppliers, in short, KUZUFLEX stakeholders. All KUZUFLEX stakeholders are expected to comply with the KUZUFLEX Code of Ethics.

It is the primary duty and responsibility of the senior and mid-level managers working at KUZUFLEX and its subsidiaries to ensure that the latest version of the KUZUFLEX Code of Ethics is communicated to all employees, that employees understand the importance of these rules, and that they adhere to them.

The responsibility of documenting that the latest version of the KUZUFLEX Code of Ethics has been read, understood, and committed to by employees lies with their immediate supervisor.

3.0 RESPONSIBILITIES


3.1. General Manager: Responsible for approving white-collar personnel employment.

3.2. Department Managers: Responsible for determining personnel needs, preparing personnel selection criteria and job descriptions to be submitted to Human Resources, conducting performance evaluations of personnel, coordinating with Human Resources for annual paid leave planning, ensuring the utilization of leaves, and participating in suggestion evaluation meetings.

3.3. Human Resources: Responsible for conducting and updating the procedures' activities, and overseeing their implementation.

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4.0 DEFINITIONS

4.1. Employment: The act of hiring, providing work.

4.2. Child Worker: A person who has completed the age of 14 but has not yet reached the age of 15 and has completed primary education.

4.3. Young Worker: A person who has reached the age of 15 but has not yet reached the age of 18.

4.4. Special Needs Workers: Employees with disabilities, pregnant employees, and those with chronic illnesses (under the supervision of the occupational physician).

5.0. UYGULAMA

5.1. KUZUFLEX Employee Relations


KUZUFLEX:

- Values its employees and treats them with respect for their rights.
- Seeks suitability for the job as the sole criterion in recruitment and employment, ensuring equal opportunities without discrimination.
- Aims to attract the most qualified young individuals and experienced professionals to KUZUFLEX.
- Aims to maximize the potential of employees' talents, strengths, and creativity.
- Provides equal opportunities and facilities for the training, guidance, and development of employees.
- Rewards success with fair and competitive wage policies, effective and objective performance evaluation systems, and practices.
- Aims to increase employees' loyalty to the company by ensuring equal opportunities for advancement and rewards.
- Ensures the continuity of industrial peace.
- Provides employees with clean, healthy, and safe working conditions.
- Creates and maintains a transparent and mutually respectful working environment that encourages cooperation and solidarity, where verbal or physical harassment is not tolerated.
- Evaluates employees' opinions and suggestions, responds to them, and takes motivational measures.
- Does not share confidential information about employees with third parties without the employee's consent and knowledge, except for legal obligations.
- Does not employ or accept the employment of child and young workers.
- Respects human rights.

Expected Behavior from KUZUFLEX Employees:

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- Always comply with the laws.
- Fulfill their duties within the framework of basic moral and humane values.
- Act fairly, in good faith, and with understanding in all relationships to benefit mutually.
- Refrain from gaining unfair advantage or giving and receiving bribes, regardless of the purpose.
- Act in accordance with the relevant Ethics Rules and the principles of application supported by these rules, Discipline regulations, and other company directives in the tasks undertaken, avoiding behaviors that would damage KUZUFLEX's reputation in both professional and personal life.
- Do not make statements, commitments, or correspondence that would bind the company without explicit authorization.
- Do not engage in behaviors that would disturb or harm other employees or disrupt work harmony.
- Take care of all tangible and intangible assets of the company, including information and information systems, as their own property, protecting them against possible loss, damage, misuse, abuse, theft, and sabotage.
- Do not use working hours and company resources directly or indirectly for personal gain and/or political activity and gain.
- Expect employees not to take a position in another institution or organization outside KUZUFLEX for profit or political activity in areas related to their profession or expertise without the company's approval.

5.2 External Relations of KUZUFLEX

5.2.1. Communication with KUZUFLEX Stakeholders

- All brands owned by KUZUFLEX are represented positively in society, enhancing their reputation.
- Maintains open communication channels with KUZUFLEX stakeholders, benefiting from criticism and suggestions, and ensuring the continuation of positive relationships.


5.2.2. Compliance with Laws and Legal Procedures

- Acts in accordance with laws, international agreements to which the Republic of Turkey is a party, Kuzuflex policies, and working principles in all relevant areas.
- Manages, records, and reports all business activities, components, and systems fully and appropriately in accordance with the law.
- Ensures that contracts with other individuals and organizations are lawful, clear, and understandable, and comply with ethical rules.
- Prevents any employee from undertaking any transaction that would bind KUZUFLEX without being authorized in accordance with the principles and limits specified in the Signature Circular or the relevant special authorization document.

5.2.3. Social Responsibility

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- Supports activities contributing to economic and social development.
- Shows sensitivity to issues concerning society and provides support for the positive development of society.
- Supports employees' voluntary participation in suitable social activities with social responsibility awareness.

5.2.4. Customer Relations

- Aims to create value for customers and meet their needs and requirements at the highest level.

5.2.5. Supplier Relations

- Aims to create mutual value in business relations with suppliers.
- Conducts communication with suppliers openly, directly, and accurately.
- Makes decisions on supplier selection based on objective criteria.
- Adheres to reasonable confidentiality and occupational safety rules requested by suppliers in supplier relations.

5.2.6. Competition

- Does not engage in agreements or concerted practices, directly or indirectly, with competitors or other individuals or organizations, which aim to prevent, distort, or restrict competition beyond the limits permitted by legislation or relevant regulations.
- Does not abuse its dominant position in certain markets, alone or in collaboration with other enterprises.
- Avoids negotiations and information exchanges with competitors concerning determining market and/or competition conditions.

5.2.7. Corporate Disclosure


- Makes disclosures or announcements regarding public enlightenment in accordance with the law and legislation through legal representatives.
- Ensures that news or promotional statements are made only by KUZUFLEX representatives appointed in accordance with the Company Disclosure Principles.
- Any information request received outside the normal course of business is responded to by KUZUFLEX representatives within the scope of the Company Disclosure Principles.
-

5.2.8. Quality

- Aims for excellence in its processes with the goal of customer satisfaction and world-class production.
- Supports the participation, competence, and creativity of KUZUFLEX stakeholders in the quality culture.
- Constantly improves the quality level of products and services to the most competitive level.

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- Updates the quality management system according to evolving production technology and customer expectations and provides customer-focused responses.
- Ensures the continuous effectiveness of its processes to achieve quality and cost objectives and increase efficiency.

5.2.9. Environment

- Develops methods to prevent pollution at its source by perceiving all waste disposal processes as a loss of natural resources.
- Fulfills all legal requirements related to the environment and other environmental protection obligations in its processes.
- Aims to increase environmental awareness among its employees and business partners by providing education, and aims to minimize natural resource needs, energy losses, and waste.

5.2.10. Global Responsibility

KUZUFLEX AŞ; Acts for the benefit of our country and our world in accordance with the principles set out in the United Nations Global Compact and strives to ensure that its employees, dealers, and suppliers comply with them.

5.3 Asset and Information Management


5.3.1. Intellectual Property Rights

- Ensures timely initiation and completion of legal procedures to secure the intellectual property rights of newly developed products, processes, and software.
- Employees are aware that all intellectual and industrial property rights created during their work at KUZUFLEX belong to KUZUFLEX and act sensitively against the violation of these rights.
- Avoids unauthorized use of patents, copyrights, trade secrets, trademarks, computer programs, or other intellectual and industrial property rights belonging to other companies.
- Documents inventions and innovations made in accordance with KUZUFLEX procedures and does not share them with third parties without written approval from KUZUFLEX.
- Does not use works covered by copyright without the permission of the copyright holder, and shows necessary care and attention in this regard.

5.3.2. Information Management

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- Ensures the proper maintenance of all legal records.
- Ensures that all requests for information and documents from official institutions are responded to by the relevant departments within the normal course of business.
- Does not respond to requests for information falling under the category of company secrets from third parties without the approval of top management.
- Ensures that the statements and reports disclosed by the company are accurate.
- Documents used by employees in their work-related activities are owned by KUZUFLEX. These documents are stored or destroyed in accordance with KUZUFLEX procedures.

5.3.3. Asset Management

- Takes care to protect and efficiently use company assets and takes all necessary measures to prevent theft or damage.
- Employees are responsible for assets entrusted to them and for damages arising from their use.

5.3.4. Security and Crisis Management

- Takes necessary measures to protect employees, information and information systems, factories, and administrative facilities against potential terrorism, natural disasters, and malicious attempts.
- Prepares necessary crisis plans for emergency crisis management in the event of terrorism, natural disasters, etc., ensuring business continuity with minimal loss during crises.

5.3.5. Confidentiality

- Actively maintains the confidentiality and protection of KUZUFLEX's financial and commercial secrets, trade secrets, personnel rights, and information.
- Does not share business-related information learned during employment with unauthorized persons or entities, directly or indirectly.
- Does not use non-public information about other companies, their customers, or other entities with whom business is conducted for purposes other than intended, and does not share such information with third parties without proper authorization.


5.3.6. Avoiding Conflicts of Interest

Takes measures to avoid conflicts of interest that may affect the impartial performance of employees' duties or the appearance thereof. Employees do not engage in any activities that could create conflicts of interest with KUZUFLEX.

5.3.7. Not Trading with Own or Close Associates' Interests

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- Do not exploit position and authority for personal gain, or for the benefit of oneself, family members, or third parties.
- Take care not to fall into a conflict of interest situation with KUZUFLEX.
- Ensure that personal investments or activities outside of work do not hinder the performance of current duties, and make an effort to avoid situations that distract from primary responsibilities.
- Inform the superior if an employee holds a first-degree decision-making position in the company as both an employee and a family member, relative, or close associate of a customer or supplier involved in the same business.
- Employees must disclose any ownership of shares or investment in another company that may be considered a conflict of interest during their initial employment. This issue is particularly scrutinized during job interviews. Employees should report any changes or similar conflicts that may arise to a higher-level manager, and this information should be communicated to at least two levels of management.
- Notify the superior if it is learned that a first-degree relative has ownership of shares or a financial interest in another company with which commercial relations are maintained.

5.3.8. Attendance to Representation and Organization Invitations

Approval from the Company is required for participation in events and activities organized by individuals or institutions with whom or which there is or may potentially be a business relationship, and which may have an influence on decision-making or be perceived as such. Support activities conducted by KUZUFLEX (such as sponsorships, scholarships, etc.) are managed corporately. No employee who has not been assigned a task may act on behalf of KUZUFLEX in these and similar matters.

5.3.9. Giving and Receiving Gifts


- In conducting relationships with individuals or organizations, whether private or public, who wish to establish or maintain a business relationship with KUZUFLEX:
- Except for promotional materials, no gift that may give the impression of irregularity, create a dependency relationship, or be perceived as such is accepted or offered.
- No discounts or benefits that may be perceived as inappropriate are requested from suppliers, dealers, authorized service providers, customers, community companies, or third parties, nor are they offered to third parties, and they are not accepted if offered.

5.3.10. Former Employees Doing Business with KUZUFLEX

- It is of utmost importance to be cautious about former employees engaging in business with KUZUFLEX either by establishing their own company or becoming a partner in a company, and conducting sales, contracting, consulting, brokerage, representation, dealership, or similar activities that may create negative perceptions.
- Acting in the interest of the company, adhering to moral and ethical rules, and avoiding conflicts of interest before and after such a process is crucial.
- If an inappropriate situation arises, no commercial relationship should be established with the individual in question. Except for exceptional cases, establishing such commercial relationships with former employees should be prevented to avoid negative perceptions.

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5.3.11. Insider Trading

It should be known that attempting to obtain any commercial benefit, including direct or indirect buying and selling of shares from stock exchanges, by using any kind of confidential information belonging to the company or by providing it to third parties is a legal offense (insider trading), and one must absolutely refrain from it.

5.4 Occupational Health and Safety

KUZUFLEX adopts the principle that improving occupational health and safety is the shared responsibility of all employees by fulfilling all legal and other obligations regarding occupational health and safety, and uses a proactive approach to occupational safety in all its activities.

- KUZUFLEX aims to ensure full occupational health and safety in the workplace and during work. Employees adhere to these rules and instructions and take necessary precautions accordingly.
- Employees shall not keep any items or substances in the workplace that pose a danger or are illegal in nature, except for those maintained with a valid medical report.
- Employees shall not possess, use, or work under the influence of drugs, addictive substances, or substances that limit or eliminate mental or physical faculties in the workplace, except as permitted by a valid medical report.

5.5. Ban on Political Activities


KUZUFLEX does not make donations to political parties, politicians, or political candidates. Within the premises of the workplace, demonstrations, propaganda, and similar purposeful activities are not allowed. Company resources (such as vehicles, computers, and email) cannot be allocated for political purposes.

5.6. Employees Requiring Special Policies

- Employees requiring special policies are positively distinguished.
- Main and alternate escorts have been designated for these employees to be safely evacuated from the work areas during extraordinary situations such as earthquakes, fires, etc. Relevant individuals have been notified through written and verbal communication as well as internal correspondence.
- While traveling in company vehicles, the first two seats behind the driver are allocated for these employees. If there are no employees requiring special policies, these seats can be used by other employees.
- During meal service in the cafeteria, employees requiring special policies will receive the first service without having to wait in line.
- Cafeteria staff have been informed verbally and in writing regarding this matter.

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- In case of receiving services from the Human Resources department, employees requiring special policies have priority.

5.7 Ethics Code Implementation Principles

5.7.1. Obligation to Report Violations

- Employees are obligated to report to their immediate supervisor or, depending on the situation, to Human Resources verbally or in writing if they learn or suspect that the company's applicable laws, regulations, or rules are being violated.
- Disclosure of the report made by the person to third parties in a manner that negatively affects the peace in the workplace or business relationships will be strictly prevented.
- The reporting mechanism should be in line with the company's interests.
- It is crucial that the person making the report is free from intentions such as gossiping about the reported individual or attempting to negatively impact their career. Therefore, confidentiality, objectivity, and compliance with ethical rules are extremely critical in the reporting and investigation process. Both the person making the report and those managing the process related to the issue must pay maximum attention and importance to this matter.
- Intentional false reports and/or allegations of defamation are considered violations of ethical rules when detected.

5.8. Disciplinary Action

Following violations of the Code of Ethics, the following disciplinary measures are applied:


- If misconduct is determined to have been knowingly committed, dismissal (in accordance with the relevant articles of labor law) may be applied and legal action may be initiated if deemed necessary. Any beneficial actions performed by the individual in the past cannot serve as partial or complete amnesty reasons for the decision taken against someone who knowingly obtained undue benefits.
- If there is no misconduct, or if the negligence or omission resulting from carelessness or lack of knowledge is present, an appropriate verbal or written warning is issued based on the severity of the incident.

5.8.1. Execution and Oversight

- The operation of the ethical rules defined above and to be complied with in all activities is managed by the Ethics Committee established within KUZUFLEX. The Ethics Committee may

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assign individuals or groups responsibility for relevant activities and ensures that necessary measures are taken.

- The implementation and sanctions regarding company policies, service contracts, and KUZUFLEX Discipline Directive are determined in memoranda and procedures.

Ethical Rules are executed in coordination with the provisions of the Personal Data Protection Law (KVKK) and the Discipline Directive.

6.0. RELATED DOCUMENTS

4.1. Quality Manual

4.2. Personnel Handbook (PH)

4.3. Documentation and Record Management Procedure

4.4. Occupational Health and Safety Procedure

4.5 Personal Data Protection Law (KVKK) Discipline Directive

7.0 ARCHIVING

All documents and records related to this procedure are stored according to the archiving instructions.

8.0 ATTACHMENTS

* ATTACHMENT-1 - Child Labor, Forced Labor, and Youth Employment Procedure

* ATTACHMENT-2 - Anti-Bribery and Corruption Procedure

* ATTACHMENT-3 - Harassment and Abuse Procedure


ATTACHMENT-1 Child Labor, Forced Labor, and Youth Employment Procedure

1. Purpose

The purpose of this Procedure is to clearly outline the principles, commitments, requirements, and stance of our company regarding the prevention of child labor, prevention of forced labor, and support for youth employment.

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2. Scope

This Procedure covers all activities of our company.

3. Responsibility

All personnel, especially Human Resources, are responsible for the implementation of the activities.

4. Definitions

In labor legislation, the working conditions of children and young workers are regulated to ensure their health and safety, physical, mental, moral, and social development, to enable them to continue their education, and to prevent economic exploitation. Here are the definitions:


- **Child worker** : A person who has completed the age of 14, has not reached the age of 15, and has completed primary education.
- **Young worker**: A person who has completed the age of 15 but has not yet reached the age of 18.
 - Our company does not employ child workers.
 - The daily working hours of young workers are applied considering a continuous rest period of 14 hours within a 24-hour period.
 - Under no circumstances can a young worker be employed if the nature of the work falls into the "hazardous work" category.
- **Light Work**: obs that, by their nature and characteristics, and under special conditions during their performance:
 - Do not pose a harmful effect on the development, health, and safety of young workers,
 - Do not prevent them from attending school, vocational training, or participating in an approved educational program, and do not prevent them from benefiting from such activities.
- **Hazardous Work**: Jobs that nobody under the age of 18 can work in and include the following risks:
 - Jobs with risks of physical, psychological, or sexual abuse to the worker,
 - Jobs performed underground, underwater, at dangerous heights, or in confined spaces,
 - Jobs requiring the use of hazardous machinery and equipment,
 - Jobs requiring the handling of heavy loads and materials,
 - Jobs exposed to substances that may be harmful to health,
 - Jobs exposed to high vibration, heat, or noise.
- **Forced Labor**: The situation where a person is employed without their consent, deprived of their legal rights, and employed without being recorded. The fact that the person receives some form of compensation does not indicate that it is not forced labor.

Examples of forced labor include:Zorla çalıştırmaya örnek olabilecek durumlar:

- Employing someone by indebting them,
- Creating situations where the person does not have the right to refuse to work,

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- Cases where convicts or prisoners are employed without a court order and without the special supervision of a public authority.

5. Implementation Principles

- Our company complies with relevant local legislation and UN International Labor Organization (ILO) standards and international agreements regarding child labor, forced labor, and young employment.
- Our company does not tolerate child labor or forced labor in its operations and does not tolerate them in its suppliers.
- Our company allows young employment, provided that it supports the vocational development of the young person, does not exceed the young working hours, and is allowed to work in jobs classified as light work, whether part-time or full-time.
- Young workers or interns working in our company must be registered in accordance with legal regulations.
- It is mandatory to provide a break for young workers, thirty minutes for work exceeding two hours but less than four hours, and one hour in the middle of the working time for work between four hours and seven and a half hours.
- All our suppliers employing young workers are encouraged to comply with the standards specified in this procedure.
- When practices contrary to the principles and standards of this procedure are encountered, the business relationship with the supplier is terminated.
- Our company expects its suppliers to apply the principles and standards introduced by this procedure when selecting their suppliers and working with them.

5.1. Supplier and Subcontractor Rules

Our company expects all suppliers and subcontractors to comply with the requirements of this procedure.

To meet this requirement, all suppliers and subcontractors listed in the approved supplier list are required to sign the "General Purchase Agreement" and fulfill the necessary conditions in this regard.

* Our company reserves the right to terminate this agreement immediately if it determines that [Supplier or subcontractor] has not remedied the violation.


5.2. Coordination and Management

The coordination of the procedure is under the responsibility of the Human Resources Manager. However, all Company managers are responsible for managing the administrative and commercial functions they are responsible for in accordance with this procedure.

5.3. Penalties and Sanctions

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Non-compliance with local and international law in the areas of child labor, forced labor, and youth employment, by employees, suppliers, and/or our company, not only exposes them to penalties and sanctions but also damages the reputation of the company. Failure of any employee or supplier to comply with the laws regulating child labor, forced labor, and youth employment, or with the principles and standards defined in this procedure, may result in termination of employment or termination of commercial contracts.

5.4. Communication

Employees are required to report any suspicious situation to their managers or any of their superiors. Reports can be made to the Human Resources Manager at info@kuzuflex.com, through the hotline/message section on the website, or by calling +90 850 800 22 22.

Employees are also required to cooperate with the Human Resources Manager in investigations related to ethical issues.

All employees, representatives, and subcontractors are responsible for providing timely, clear, and accurate answers to questions asked by the Human Resources Specialist or authorized internal or external (independent) auditor regarding reports of suspected non-compliance with this procedure.

Personnel providing misleading answers are considered complicit in the offense and will be punished accordingly upon detection.

The Company does not tolerate retaliation against any employee who cooperates in good faith and is responsive to inquiries. Any suspected retaliation must be reported immediately.

Managers or other employees who retaliate against any employee may be penalized, and their contracts may even be terminated as a result.

5.5. Exceptions

This procedure is not subject to exceptions. Exceptional circumstances are reviewed by the Human Resources Specialist, who prepares a reasoned proposal and presents it to Upper Management for approval. Only with the approval of Upper Management does it come into effect. A comprehensive report on the situation should be prepared as soon as reasonably possible, and measures should be taken to prevent the recurrence of the same situation in the future, or contingency plans should be developed.

ATTACHMENT-2 - Anti-Bribery and Corruption Procedure


1. Purpose

The purpose of this Procedure is to establish the principles, methods, and responsibilities related to the fight against bribery and corruption in our company, in accordance with legal regulations and ethical values.

2. Scope

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This Procedure applies to all employees of our company.

3. Responsibility

All personnel, especially Human Resources, are responsible for the implementation of activities.

4. Definitions

Bribery: Offering, giving, receiving, or soliciting anything of value to influence the outcome of a decision.

Corruption: Offering, promising, giving, receiving, or soliciting, directly or indirectly, anything of value to gain or maintain an advantage in business activities.

Gift: Any item or benefit, with or without economic value, directly or indirectly accepted by an employee that could influence or might appear to influence impartiality, performance, decision-making, or duty.

Anti-Bribery and Corruption Program: Activities aimed at defining principles, identifying risky areas, reducing or eliminating risks, outlining principles and practices in accordance with legal regulations and ethical values, and ensuring continuity and communication.

5. Implementation Principles


In accordance with our Anti-Bribery and Corruption Policy, we conduct all our activities in compliance with the principles set forth in the Turkish Penal Code numbered 5237 and the Misdemeanor Law numbered 5326, as well as institutional values.

5.1. Rules

- Our suppliers, subcontractors, consultants, customers, employees, and all our business partners with whom we may work should not be listed on national or international lists of prohibited persons.
- We do not work with companies for which negative intelligence related to bribery or corruption has been received. It is the responsibility of the relevant process manager to conduct the necessary market research before starting to work.
- Employees of the institution cannot enter into indirect private business relationships with the institution's customers for their own benefit, request any service, money, or other consideration in exchange for any business, borrow money, or lend money to customers.
- Direct offers, payments, and various benefits given to institution employees by customers under commercial bribery are considered crimes and are punishable by law. In this context, it is strictly prohibited for institution employees to accept personal payments or bribes, whether directly or indirectly.

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- No assistance or donations can be accepted from any individual or organization associated with the institution.
- Institution employees cannot accept gifts, various privileges, or souvenirs from customers or individuals and institutions from whom we purchase services, nor can they make any requests that would obligate the institution or the field. However, gifts of value within the limits, within the framework of tradition and/or ceremony principles, can be accepted. (Gifts can be accepted if they bear the special mark of the giving company. For example, pen, agenda, etc.)
- Any kind of gift intended to be given to third parties by our company must be given openly, in good faith, and unconditionally. Even if it complies with our company rules, it should not lead to conflicts of interest or be perceived in such a way when heard by the public. In such cases, gifts should not be offered or accepted.
- Representation and hospitality; social events; accommodation and meal invitations; Hospitality can be offered to third parties for the purpose of developing commercial relations and establishing a normal commercial communication network by the Institution, and hospitality is offered openly, in good faith, and unconditionally. Representation and hospitality expenses are subject to approval within the limits determined by our company. Hospitality offers or acceptance should not lead to conflicts of interest or be perceived in such a way, and in such cases, hospitality offers should not be made or accepted.
- Restrictions imposed on donations and assistance in accordance with relevant legal regulations are complied with and carried out with the approval of the Upper Management. Neither the institution nor individuals can provide material or moral support for political activities.

5.2. Violation Reporting

All incidents and situations related to bribery and corruption should be reported to info@kuzuflex.com via email, through the hotline/message section on the website, or by calling +90 850 800 22 22, or by submitting a written petition.

The identity of the reporting person will always remain confidential, and this confidentiality is guaranteed by Upper Management.


5.3. Evaluation

The evaluation of reports regarding bribery and corruption violations is the responsibility of Upper Management, with the secretariat being managed by the Human Resources Manager.

5.4. Corrective Actions

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In cases of violations, corrective actions are undertaken by determining all necessary measures, the frequency of controls, and protective measures. Corrective action (CA) records are created, and the process is monitored with CA records to identify root causes and establish actions that will ensure the rectification of the nonconformity and prevent its recurrence.

5.5. Disciplinary Measures

Disciplinary actions are taken in accordance with the Disciplinary Directive for employees who violate the rules.

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ATTACHMENT-3 - Harassment and Abuse Procedure

1. Purpose

The purpose of this Procedure is to clearly establish the principles, commitments, demands, and stance of our company regarding the prevention of child labor, prevention of forced labor, and support for youth employment.

2. Scope

This Procedure encompasses all activities of our company.

3. Responsibility

All personnel, especially Human Resources, are responsible for the execution of activities.

4. Tanımlar

1. DEFINITION OF HARASSMENT

Harassment refers to verbal or physical behaviors, with or without the use of coercive power, targeting individuals or groups based on race, origin, religion, sexual orientation, gender, or personal characteristics.

1.a/ Definition of Physical Harassment: Any behavior that may cause any kind of harm to a person's body constitutes physical harassment. Examples include slapping, punching, pushing, throwing objects, exposing to cold, using sharp objects, kicking, etc.

1.b/ Definition of Verbal Harassment: Using derogatory words (e.g., swearing) and making verbal threats that may damage the reputation of employees.

1.c/ Definition of Psychological Harassment (Mobbing): Mobbing refers to psychological pressure, violence, or harassment causing distress. For example, making an individual feel incapable of performing a job they have been doing for a year and assigning them to a simpler task. For instance, telling someone who has been working as a machine operator for a year, "You will now be a laborer."


1.d/ Definition of Sexual Harassment: Sexual harassment refers to unwanted exposure to visual or physical gestures, jokes, or offers, against an individual's will. Behavior that is disrespectful and demeaning falls under harassment when it causes personal discomfort.

Examples include,

- Unwanted jokes, slander, and accusation of faults.
- Written or verbal words containing swearing, threats.
- Malicious, suggestive, insistent looks.
- Physical or sexual assault, molestation.

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- Belittlement in front of other employees.

Misuse is defined as illegal events that can be characterized as fraud, concealment, or trust-damaging behavior.

The purpose of both the employer and the employees within the company is to use their goodwill to benefit themselves in their own interests.

In this context, misuse should be evaluated from both the employer and employee perspectives.

5. Implementation Principles

At KuzuFlex, we commit to creating a respectful and safe working environment for all our employees and customers, ensuring compliance with all relevant local and national laws. We pledge to not tolerate any form of harassment or misuse at any point in the workplace, starting from the recruitment process to every corner of the work area.

As management, we commit to promptly and fairly investigate all complaints that are deemed as harassment or misuse, ensuring honesty and impartiality throughout the process. We promise to expedite the process and conclude it with preventive and corrective measures.

Under no circumstances is anyone allowed to exploit the rights of others within our company, and no one is allowed to harass another person. We have established our policy to detect such situations, and it has been shared with all our employees.

New employees are briefed on our harassment and misuse policy by the personnel officer.

Rights and Responsibilities of Those Experiencing Harassment


Individuals who believe they have experienced or witnessed harassment can directly approach their managers, the personnel officer, or unit supervisors. They can also report their complaints via email or phone. The rights and responsibilities of these individuals are as follows:

- Complaints should be promptly processed when written or verbalized.
- They should be supported by someone they trust during the process.
- They have the right to be treated fairly.
- They should be informed about the investigation process.
- No information related to the incident should be reflected in their file.
- Kişinin dosyasına olay ile ilgili herhangi bir bilgi yansıtılmaması.

Rights and Responsibilities of Individuals Accused of Harassment

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Stay calm and do not get angry. You may have inadvertently made someone uncomfortable. Think about what you can do to correct this situation (apologize, correct the behavior complained about, etc.).

RIGHTS;

- To be informed about the details of the accusation.
- To know that a fair and impartial investigation is being conducted.
- To be informed about the progress of the investigation process.

Management Responsibility

Interviews will be conducted with both parties and witnesses, if any, and a report on the incident will be prepared. The report will include statements from the individuals involved, if any, camera recordings, the conclusions reached by management, and the disciplinary actions to be taken.


- Each manager or unit supervisor is responsible for ensuring that the individuals they are responsible for work in a peaceful and respectful work environment.
- They are responsible for promptly and impartially investigating any harassment or misuse complaints they receive.
- Additionally, if there are behaviors that deviate from the norm among employees (such as decreased performance, increased leave requests, self-isolation of an employee, group formation, and intergroup chaos, etc.), they should be able to identify and address them.

Privacy Policy: hen addressing harassment allegations, management adheres to the principle of respecting the privacy of the personal lives of the complainant and the accused individuals throughout the investigation, from the beginning of the complaint to its conclusion.

In cases where incidents have not been reported to law enforcement, the identities of the complainant and the accused are never disclosed to a third party and all information is kept confidential in the files.

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Misuse

Misuse is defined as illegal acts that may be characterized as fraud, concealment, or trust undermining.

The aim of misuse within the company is for employees and top management to exploit their good intentions for their own benefit. In this context, misuse should be evaluated from the perspective of both the employer and the employee.

Examples of misuse against employees from the employer's perspective:

- ✓ Incorrect calculation of entitlements
- ✓ Violation of employee rights according to local laws (leave rights, forced labor, discrimination, etc.)
- ✓ Failure to provide health and safety conditions in the workplace
Neglecting to bring working conditions to a sufficient level for employees

Examples of misuse against the employer and the company from the employee's perspective:

- ✓ Sharing confidential and important information with third parties outside the company
- ✓ Using all the opportunities provided by the company to their detriment
- ✓ Deliberately neglecting duties and responsibilities to the detriment of the company
- ✓ Damaging or misusing all the tools and materials provided by the company for their benefit

Method for Dealing with Harassment and Misuse

In the event of such behavior, management evaluates the evidence and proofs related to the situation. Witnesses are heard if available. Based on the Business Personnel and Labor Law, management makes a decision on the matter as soon as possible. In implementing the decision, care is taken to be objective regardless of the subordinate-superior relationship between employees and to apply the decision fairly.

To prevent unwanted situations within the company and maintain peace in the work environment, all administrative staff and employees are trained, explaining the company's determination on this issue.

Communication

Contact Persons and Contact Information for Those Experiencing Harassment and Misuse

You can communicate with the following individuals via written, verbal, telephone, or email:


Company Executives

info@kuzuflex.com

When employees encounter a suspicious situation, they must report everyone involved in the suspicious behavior, even if they are their managers or superiors. The reporting channels are as stated above.

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All employees, representatives, and subcontractors are responsible for providing timely, clear, and accurate answers to questions asked by the Quality Management Specialist, Human Resources Specialist, or authorized internal or external (independent) auditor regarding suspicions of non-compliance with this procedure.

Personnel providing misleading answers are considered complicit in the offense and are accordingly punished if detected.

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