



# Bergama Industry Code of Ethical Conduct

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## **1. Purpose**

The Bergama Industry Code of Ethical Conduct has been prepared with a view to defining the corporate codes of practice and individual rules of conduct, in line with the Values and Strategies of Bergama Industry, putting in writing the ethical principles on which Bergama Industry bases its relations with its customers, suppliers and other business partners.

In compliance with the Bergama Industry corporate culture, we believe that ensuring the Code of Ethical Conduct is known and exercised by all our employees, and being principled, meticulous and standard in our behaviors will be positively reflected on our business results and shall thus maximize the satisfaction of all our stakeholders. All Bergama Industry employees are expected to pay the utmost attention and commitment to the ethical code of conduct.

## **2. To Act in Line with Company Quality Principles**

### **2.1 Law-Abiding**

At Bergama Industry, all business activities and its accounting system are managed to be completely and fully in line with the law and with company policy and business principles and are recorded and reported as such.

### **2.2 Customer Relations**

At Bergama Industry, we work in a proactive manner that is customer-satisfaction oriented, and which meets the demands and needs of our customers promptly and correctly. We develop long term relationships with our clients that are built on trust and on the basis of respect and courtesy, and while creating value for our customers through operational perfection and flexibility, we also meet their demands and needs with a high degree of satisfaction.

### **2.3 Supplier and Dealer Relation**

At Bergama Industry, we work with suppliers and dealers who possess a corporate quality system, who are ethical and honest, who are familiar with our business approaches, and who have criteria-proven competency. The performance of our suppliers and dealers are constantly evaluated within the scope of certain competency criteria and their corporate development is supported.

### **2.4 Competition**

At Bergama Industry, we refrain from using dishonest advertising and sales methods, we do not discredit our competitor's products and activities with misleading statements, and we do not try to gain a competitive edge by portraying the competencies of Bergama Industry as different from what they really are.

## **3. Respecting Human Rights**

### **3.1 Diversity and Inclusion**

Our labor force is made up of gifted professionals who are dedicated to the attainment perfect results for all our stakeholders. Our aim is to empower Bergama Industry employees by encouraging cooperation while benefiting from the knowledge and skills of each and every one of our diversified employees. To this end, we respect and value the different backgrounds, experiences and ideas of our employees in all levels of Bergama Industry activities.

### 3.2 Recruitment Practices

At Bergama Industry, all employment decisions are based solely on the criteria of suitability for the job. In matters of employment, equal opportunities for all are assured, with no discrimination made on the basis of nationality, race, language, religion, sect, sex, marital status, disability, political opinion, or any other status protected by law.

### 3.3 Harassment-free Workplace

At Bergama Industry, there is zero tolerance for harassment. Bergama Industry employees work in a safe and professional working environment where virtue and skills are rewarded, and where diversity and trust are encouraged.

### 3.4 Employee Personnel Information

Personnel information of employees is not shared with third parties without the consent and knowledge of the employee, aside from information governed by legal obligations.

### 3.5 Avoiding Child Labor and Human Trafficking

At Bergama Industry, we do not tolerate child labor, forced labor, human trafficking or procurement of commercial sex acts. Bergama Industry employees strive to ensure that Bergama Industry does not retain suppliers, contractors or other business partners who engage in such activities.

## 4. Asset and Information Management

### 4.1 Intellectual Property Rights

At Bergama Industry, we avoid the deliberate unauthorized use of patents, copyrights, trade secrets, brands, computer software or other intellectual or industrial property rights, and exercise due care and attention so as not to use in any way works under copyright without the consent of the copyright holder.

### 4.2 Information Management

At Bergama Industry, all legal records are kept as stipulated by law, and are administered in a timely fashion. Employees exercise due diligence in ensuring that reports declared by Bergama Industry are truthful, acting with the awareness that all documents related to business belong to Bergama Industry, ensuring that all records and said documents are kept in line with Bergama Industry's procedures, and when necessary, destroyed according to the rules defined by law. No unlicensed software may be installed on company computers, software cannot be utilized beyond one's authority, and cannot be copied.

### 4.3 Asset Management

At Bergama Industry, all kinds of tools, equipment, materials and fixtures are used in the best possible way, and all company assets are protected and used efficiently.

### 4.4 Security and Emergency Management

At Bergama Industry, as a result of the emergency crisis management system that has been established for activation in the event of an act of terrorism, natural disaster or similar situation, continuity of work is ensured with minimum loss at times of crisis. In the event of terrorist activities, natural disasters or malevolent attacks, the necessary measures are taken to protect Bergama Industry employees, information and information systems, factories and administrative installations.

#### **4.5 Confidentiality**

Bergama Industry is fully aware of its liabilities according to Law no. 6698 on the Protection of Personal Data as data responsible and carries out its activities by fulfilling these liabilities. At Bergama Industry, confidential information and data on our customers and suppliers is protected and is not shared with anyone but the relevant authorities. Personal information on our employees is confidential and is not shared with anyone but those concerned.

#### **5.Trade Controls**

At Bergama Industry, in the event of products and technologies subject to export and import controls being transported and/or used, all relevant laws, regulations, company principles and practices are observed.

#### **6. Money Laundering**

“Money laundering” refers to transactions in which persons or entities filter the financial proceeds of crime through the financial system in order to “clean” evidence of its illegal source in the past, or to portray it as if it was legal. At Bergama Industry, we remain vigilant against any financial irregularities in payment forms.

#### **7. Avoiding Conflict of Interest**

The name, property and knowledge accumulation of Bergama Industry, and the duty and position of the employee within Bergama Industry, cannot be used for personal gain.

#### **8. Rules Regarding Transaction for the Benefit of Oneself and Acquaintances**

At Bergama Industry, it is forbidden to provide unfair advantages to an employee, acquaintances or third persons by making use of one’s title and authority.

#### **9. Receiving and Giving Gifts**

It is forbidden for a Bergama Industry employee to request any kind of personal benefit from suppliers, customers or third parties that may be perceived as improper, nor shall a Bergama Industry employee offer benefits to third persons or accept offers from such persons. When establishing relations with private or public persons or institutions that are looking to establish or continue a business relationship with Bergama Industry, no gifts may be received or offered that may be perceived as an irregularity, and which may cause a relationship of dependency or may be perceived as such.

#### **10. Zero Tolerance for Bribery**

Bribery refers to a grant or promise of anything of value or any other advantage with the purpose of improperly influencing the activities of private or legal third persons. At Bergama Industry, we show no tolerance of bribery. The consequences of bribery are heavy both for Bergama Industry and the related individuals and include legal and criminal liabilities.

#### **11. Responsibilities of The Employees**

The Bergama Industry Code of Ethical Conduct includes detailed information on how we carry out our work. Abiding by this code is the primary responsibility of all employees. In this respect, all Bergama Industry employees have the responsibility to:

- Act in accordance with laws and regulations under any conditions,

- Read the Bergama Industry Code of Ethical Conduct; and to know, understand, internalize and act according to the rules, principles and values included within,
- Learn the policies and procedures that are applicable to the company in general, and those specific to their work,
- Consult with his/her manager and the Ethical Committee in the event of potential violations involving him/herself or others,
- Immediately report possible violations of him/herself or others; to provide notifications of the subject in writing, either with his/her name or anonymously, to his manager and/or the Ethical Committee.
- Cooperate with the Ethical Committee in ethical investigations and keep information about the investigation confidential.

## **12. Responsibility of the Administrators**

Bergama Industry administrators, within the framework of the Bergama Industry Code of Ethical Conduct, have additional responsibilities to those defined for the employees. Accordingly, the administrators are responsible for:

- Communicating the Code of Ethical Conduct to the employees,
- Setting an example and leading the employees in line with the ethical code,
- Supporting employees in communicating their queries, complaints and notifications related to the ethical code,
- Providing guidance on actions to be taken when consulted, taking into consideration any notifications made, and informing the Ethical Committee immediately when deemed necessary.

## **13. Resolution of Noncompliance with Ethical Code**

Bergama Industry can only take action if it is informed about the misconduct.

If employees find out or suspect that the company is in violation of the laws, regulations or ethical rules to which it is subject, they may communicate their concerns to the Bergama Industry Ethical Committee by writing.