

ETHICAL RULES HANDBOOK

1. PURPOSE

Ethical Rules are the set of rules that guide us in all our attitudes and behaviors while conducting our activities and work within the framework of laws, regulations and procedures.

2. SCOPE

All employees are obliged to know, understand and apply the principles included in the Business Ethics Rules. The Business Ethics Rules cover all employees. It undertakes to display attitudes and behaviors in accordance with the Ethical Rules detailed below in all activities and relationships with the individuals and organizations with whom it has business relations at home and abroad, the society in which it is located, its customers, suppliers, partners and employees, to comply with the ethical criteria accepted by the company and to make efforts for the widespread adoption of all these principles, especially in its own sector.

3. PRINCIPLES

1. Honesty:

It abides by its promises and agreements regarding the products it provides to its customers. It avoids unauthorized use of patents, copyrights, trade secrets, brands, computer programs or other intellectual and industrial property rights by itself or through other companies. It cannot be a party to agreements (such as price-fixing agreements) with competitors or other persons or organizations that restrict freedom of trade. It cannot engage in deceptive behavior by making misleading statements and promotions about the commercial and financial situations of the company and others. It does not use disparaging, mocking and offensive expressions about other institutions and organizations, products and individuals.

2. Respect for the Law:

It acts in accordance with legal rules in all its activities. It checks that the services it receives from other organizations are provided in accordance with the law and carries out the necessary follow-up. It aims to fulfill its tax and other legal obligations fully and on time and to set an example for the society. It does not engage in illegal or criminal activities. It does not resort to methods and methods that business and social ethics would not approve in business life. Employees cannot take any action that will represent the company to third parties, and cannot correspond on this subject, unless explicitly authorized by the managers.

3. Human Resources:

In cases where the laws are insufficient, it protects the rights of its employees within the framework of business ethics rules. It avoids all kinds of forced and oppressed labor. The company fully fulfills its legal obligations towards all employees in effectively preventing child labor and preventing discrimination in recruitment and work processes. It does not interfere with the private information of its employees and the private lives of its employees, and keeps all information about its employees confidential. It takes into account the qualifications of suitability for the job as a criterion in recruitment and promotions. It does not discriminate against gender, age, ethnic origin, political and religious beliefs in practices targeting employees. It creates healthy and safe working conditions at the level required by the laws and conditions by the employer and tries to improve them to the extent possible. It keeps confidential and does not share personal information about its employees that can be obtained through various channels. Employees avoid any behavior that would damage the image and reputation of the company and do not deviate from the dress code and behavior style previously determined by the company management or generally accepted during working hours.

4. Obtaining, Using and Protecting Information:

It provides accurate and complete information about the company and its activities to the public and relevant social stakeholders within the framework of information policies. It does not share the private information of the

companies that provide services to it with third parties without their permission. Employees cannot leak confidential and private information learned as a requirement of the position or the job performed outside the company. Employees must comply with the company's commercial information and confidentiality obligation even after leaving the company. All documents that employees use or create while performing their jobs belong to Boemar. These documents must be true. Salary, fringe benefits and similar personal information of personnel that reflect company policy and are personal to the person are confidential and cannot be disclosed to anyone other than the authorities. Information about personnel is sent privately to the person. It is unacceptable for personnel to disclose this information to others or to pressure other employees to disclose the information.

5. Occupational Health and Safety and Environment:

Each employee is responsible for both their own occupational safety and the occupational safety of their colleagues, as well as all procedures and instructions related to OHS and the Environment that they are obliged to comply with. Each employee is responsible for knowing this defined policy and doing what is necessary. All employees must comply with the rules determined in line with these security policies and perform all their work within this scope. It supports a preventive approach in environmental issues before any harm occurs. It takes initiatives to spread a more effective environmental responsibility. It has adopted the principle of not polluting the environment and keeping the soil, water and air clean in all its activities.

PRACTICES SUPPORT ETHICAL RULES

1. Protection and Efficient Use of Assets:

In the use of assets on behalf of the company, the company's interests are taken into consideration. Without the company's interest, under any name and for anyone's name or benefit, business assets cannot be used for purposes other than their intended purpose and without authorization. Company assets cannot be taken out of the company without approval outside of working hours. Employees can only use their shifts during working hours for their job. Managers cannot assign employees to their personal business.

All employees must use company resources in the most efficient way possible. They must use time, one of the most important resources, effectively and complete meetings for essential visitors within a reasonable time frame that will not disrupt the workflow.

In order to protect the company's cash assets; all payments must be explained accurately and in sufficient detail and must be made only by authorized persons for the purpose written in the payment document and records. No payment can be made on behalf of the company without receiving authorized approval and under names such as "urgent" or similar unless supported by sufficient documents. All funds or assets belonging to the company must be recorded and explained. All records and documents belonging to the company must be accurate and honest. In other words, the document must both comply with the formal requirements and the content of the document must fully reflect the truth. The documents used within this scope; shall not be false, unrepresentative, misleading or misdirected, intentionally incomplete or suppressed (reproduced) for a special purpose. Financial information belonging to the company is confidential and cannot be shared by third parties except for legal disclosures, and no direct or indirect benefit can be gained by using company information.

2. Commitment to the Principle of Saving:

Our companies adopt the principle of preventing waste and paying attention to saving in the use of resources in the activities they carry out and the projects they carry out. This principle should be taken into consideration in the decisions taken regarding the business and the internal audits carried out. Similarly, our employees approach the economic and highly efficient use of the material resources of our organizations with the same sensitivity they show to their own family budgets. Each employee should be aware and understand that this behavior adopted as a common corporate principle will provide their companies with a competitive advantage.

3. Use and Security of Information Technologies:

Our principle regarding Information Technologies Security is to keep the risk of data loss and data security at the lowest level. Our employees (end users), who have an important place in supporting the security of information in the electronic environment, should show the necessary care in keeping their passwords secret and not sharing them with anyone, including their colleagues. In the use of personal computers, e-mails and the internet by all employees, respect is shown to the extent of their right to personal information privacy. In the event of a violation of the Business Ethics Rules, electronic communication channels can be controlled as necessary. Company computers must be used for business purposes; other than these, all employees must not have any expectation of privacy regarding the use of company computers and e-mail accounts.

4. Conflict of Interest and Unfair Advantage:

Employees cannot benefit from their current duties to provide themselves, their relatives, families and/or third parties and institutions/organizations with whom they have business relations outside of the employment contract. No work can be carried out in their own names or on behalf of third parties, including their close relatives, that may affect important fundamental elements, that will be contrary to the interests of the company or that will benefit Boemar. Employees cannot directly or indirectly gain personal benefit from any transactions and contracts to which the company is a party.

5. Working in Another Job:

It is essential that employees do not work for another person and/or institution for a fee or similar benefit during or outside of working hours. Employees may work in non-profit organizations and universities, and in social responsibility and charity roles with the approval of the management, in a manner that will not disrupt their duties within the company. Employees make such requests to the Human Resources department with the knowledge of the relevant department manager and obtain the approval of the General Manager.

6. Accepting and Giving Gifts:

It is essential that employees do not accept gifts or benefits that may cause them to make biased decisions, affect their behavior, are not suitable for the course of work, or provide privileges or benefits, and do not attempt to provide gifts or benefits that may create such effects to third parties, institutions and organizations. Company employees cannot accept free or loaned money from subcontractors, suppliers, consultants or customers in similar positions. In addition, they cannot have the other party pay for travel expenses, event expenses and similar payments. Employees are prohibited from receiving gifts, etc. that have a monetary value that may cause them to act biasedly while performing their duties or affect their ability to make correct decisions.

Company Employees;

- They may receive and/or give the gifts specified below and outlined, provided that the gifts received are in line with the purpose of the company's business, do not conflict with laws and regulations, and will not damage the company's image and reputation if learned by external stakeholders.
- They may give or use company promotional materials to their business partners, friends, and for their personal use, without serving any interest, with approval.

Provided that the conditions specified above are met;

- Company employees may provide entertainment, treats and meals at acceptable standards for the company and/or accept invitations. (With management approval) Gifts over "20 Euros" cannot be accepted)
- They may receive and/or give gifts of symbolic value other than money, such as awards, plaques, cups, certificates, etc., at fairs, feasts, seminars and similar programs that they attend on behalf of the company.
- Provided that the specified conditions are met, the company may accept appropriate products and services as gifts, and with the knowledge and approval of the company's senior management, products or services that are in line with the recipient's culture and ethical values may be given as gifts.
- It is prohibited to receive and give gifts or benefits based on an open and/or secret relationship of interest.

- The company's senior management determines and approves the gifts and promotional materials to be given to customers, dealers and other third parties with whom it has a business relationship.
- In exceptional cases where local cultural values require giving gifts in excess of the values determined in the company policy, these gifts may only be accepted with the approval of the company's senior management. These gift exchanges will be in accordance with the culture of the region and the country.

7. Taking/Giving Bribes and Abuse of Office:

In exceptional cases where local cultural values require giving gifts in excess of the values determined in the company policy, these gifts may only be accepted with the approval of the company's senior management. These gift exchanges will be in accordance with the culture of the region and the country.

8. Business Ethics and Behaviors:

Employees must perform their duties in an equal, transparent, accountable, and responsible manner. Mutual love, respect, trust, and cooperation should be the basis of their relationships with coworkers and other employees. All employees must respect the rights and cultural differences of individuals in the conduct of their work within the company.

Employees must not engage in acts such as harassment, rape, violence, etc. within or outside the company, and must not exhibit attitudes and behaviors that are against the customs and traditions of society, such as being known as a drunkard or a gambler. They must also avoid situations that would amount to mobbing, which is also regulated by law. Because such behaviors will negatively affect the company and damage the corporate image.

STAKEHOLDER RELATIONS AND RESPONSIBILITIES

1. Relations with Printed Media and Social Media:

Making statements to any publication organization on behalf of Boemar, conducting interviews, participating in seminars, conferences and similar places as speakers are subject to the approval of the company's senior management. It is forbidden to use the company's name on social media without written approval. They cannot make statements and comments on religious, social, political etc. issues using the company's name on social media. Official statements to be made to the media are made by a person or persons expressly authorized by the management.

2. Employee Responsibilities:

Employees are expected to exhibit behaviors in compliance with company procedures and rules and to protect these principles in all their work.

All employees;

- Knowing, understanding, internalizing and acting in accordance with the rules, principles and values included in the Code of Business Ethics,
- Knowing and acting in accordance with the general and work-related policies and procedures that apply to the company,
- Encouraging the compliance of colleagues with the procedures in question as well as their own compliance, and if there are those who do not comply with the rules and who make intentional or unintentional mistakes, they should directly report them to the relevant unit manager.

3. Responsibilities of Managers:

All managers must ensure that their employees are aware of the Code of Business Ethics. Managers are responsible for ensuring that a company culture and work environment that supports ethical rules is created and maintained, setting an example with their behaviors that lead the implementation of ethical rules, and

encouraging and supporting their employees to forward their and their team's questions, complaints, suggestions and notifications regarding ethical rules to the internal audit unit.

COMPANY'S RESPONSIBILITIES TOWARDS STAKEHOLDERS

Management; In addition to legal responsibilities, it takes care to fulfill the following responsibilities to its customers, employees, company partners, suppliers and business partners, competitors, society and humanity. These are;

1. Legal Responsibilities:

It carries out all activities and transactions in Turkey and abroad within the framework of the laws of the Republic of Turkey and international law, and provides correct, complete and understandable information to legal regulatory institutions and organizations on time. All kinds of off-the-record activities are prohibited, and the accuracy and consistency of documents and records are essential. While all activities and transactions are carried out, all kinds of public institutions and organizations, administrative formations, non-governmental organizations, political parties, etc. are treated equally, without any expectation of benefit, and obligations are fulfilled with a sense of responsibility and by considering the benefit of society.

2. Responsibilities to Partners:

By giving importance to Boemar's continuity and in line with the goal of creating value for its partners, sustainable profitability is aimed. By acting within the framework of financial discipline and accountability, the company's resources and assets as well as working time are managed with efficiency and savings awareness.

Attention is paid to increasing competitive power and making investments in areas with growth potential and high returns. In the information provided to partners and the public, timely, accurate, complete and understandable information is provided regarding financial statements, investments and risks.

3. Responsibilities to External Customers:

It works with an understanding focused on customer satisfaction, responding to the needs and demands of its customers in the shortest and most accurate way. It provides its services on time and under the promised conditions. It approaches its customers within the framework of respect, justice, equality and courtesy rules.

4. Responsibilities to Employees:

Employees' personal rights are fully and correctly provided. Employees are treated honestly and fairly, and a safe and healthy working environment is provided. Necessary efforts are made for the individual development of employees. Appropriate social and community activities in which they will take part with a sense of social responsibility are supported. The balance between work and private life is observed. In human resources policies and practices, performance and efficiency are taken as basis in promotion-rotation, compensation and rewarding.

5. Responsibilities to Suppliers/Business Partners:

Obligations are fulfilled on time. Confidential information of individuals and organizations with whom business is done and business partners are carefully protected.

6. Responsibilities to Competitors:

Unfair competition is avoided by competing in legal and ethical areas. Competitor products are not disparaged, misleading advertising is not made.

7. Responsibilities to Society, Humanity and Nature:

With the consciousness of citizenship; being a pioneer in social issues, situations such as natural disasters, acting sensitively, providing services for the public benefit, acting sensitively to the traditions and cultures of the regions where operations are carried out in Turkey and internationally. Efforts are made to take all measures that

are required by the legal legislation or that can be taken, even if not mandatory, regarding the protection of nature and natural life, consumer rights and public health in the places where operations are carried out.

APPLICATION OF ETHICAL RULES

The basic duty of employees is to protect and develop Boemar values and working principles, corporate reputation and reliability at all work points where they operate. In order to achieve this goal, our employees are expected to act in accordance with the company's ethical rules. The ethical rules regarding the values and principles explained in this booklet are extremely important in terms of being a guide in doing business by taking into account our company values in our daily lives and determining the most appropriate behavior in the situations we encounter. Boemar's expectation from employees is to exhibit personal responsibility and initiative and to behave in accordance with these rules.

The four main issues that employees can help management in creating a high moral culture and environment within the company have been determined as follows:

1. Making sure they understand the Code of Ethics,
2. Reflecting the code of ethics in their daily lives and work,
3. Always trying to do what is meaningful and right,
4. If they are not sure what to do about something, consulting their manager or the Ethics Committee advisors, respectively.

It is the common responsibility of every employee to report to the Ethics Committee any decisions and behaviors of employees that are observed to be incompatible with business ethics. The Ethics Committee is responsible for investigating and resolving complaints and notifications regarding violations of the code of ethics.

Employees must first report any significant wrongdoings they see or hear about, especially fraud (for corruption purposes) (for example, unauthorized personal use of company assets, waste, embezzlement, etc.), regarding the company's activities to the department manager they are related to. If the department manager is also involved in the wrongdoing in question; they must report it to the other members of the Ethics Committee.

APPLICABLE LEGISLATION

Since Boemar operates in domestic and international markets, company operations are subject to both the laws of the Republic of Turkey and the laws and regulations of different countries. When there are questions about the ethics of doing business in different countries, the legal regulations in the country where the business is done should be followed first. In such cases; first of all, the legal procedures in the country and/or countries where the business will be done should be followed, and if it may have harmful consequences in terms of the ethical values adopted by Boemar, which will operate on an international platform, in this case, solutions should be sought within the scope of our ethical rules and procedures. If necessary, the opinion of the ethics committee should be requested.

DETERMINATION OF ETHICAL COMPLIANCE

"Basic Questions to be Considered Ethically" has been prepared in order to help act in accordance with the rules of business ethics in all business processes and activities.

QUESTIONS TO BE CONSIDERED AND ASKED IN ETHICAL TERMS

- Do I know how to behave according to the Code of Business Ethics?
- Is the behavior I am engaging in in accordance with company policies and procedures, laws and rules?
- Is this behavior balanced and fair? Would I be disturbed if someone else did it?
- Is what I am being asked to do in accordance with the law and the company Code of Business Ethics?

- Is the behavior I witnessed in accordance with the law and the company Code of Business Ethics?
- Would Boemar and our stakeholders be disturbed if all the details of this behavior were made public?
- Would I be in a difficult situation or embarrassed if others knew that I was behaving this way?
- Could my behavior have negative consequences for me or the company?
- Who else might be affected by this (other employees, partners, etc.)?
- What did this behavior look like?
- How would it be reflected in the press and media?
- What would a reasonable person think in the same circumstances?

COMPLAINT REPORTS

a. Employee Complaints

Employees leave their complaints, demands and suggestions in writing in the request and suggestion box located in the production area and ensure that they reach the ethics committee. The human resources manager checks the request and suggestion box weekly and forwards the notifications made to the ethics committee for evaluation.

b. All Internal and External Stakeholder Complaints

All stakeholders of BOEMAR are expected to act in accordance with these principles and to report any behaviors they consider to be incompatible or contrary to these principles to the BOEMAR Ethics Committee via e-mail at info@boemar.com.tr or in writing via the contact addresses.

RESOLUTION OF NON-COMPLIANCE WITH ETHICAL RULES

Those who violate the Business Ethics Rules and company policies and procedures will be subject to various disciplinary sanctions, including, if necessary, being asked to leave the job. Disciplinary sanctions will also be applied to those who approve, direct or have knowledge of inappropriate behaviors and actions that violate the rules but do not make the necessary notification appropriately.

ETHICS COMMITTEE

The Ethics Committee is tasked with investigating and resolving complaints and notifications regarding violations of ethical rules within the scope of the Boemar Code of Ethics. The Ethics Committee, which reports to the General Manager, consists of the following titles and individuals.

Ethics Committee Chairman	Business Development Director
Ethics Committee Member	Plant Manager
Ethics Committee Member	Human Resources Officer
Ethics Committee Member	Financial Affairs Manager
Ethics Committee Member	Quality Manager

ENFORCEMENT AND ETHICS COMMITTEE WORKING PRINCIPLES

All employees are deemed to have accepted the terms and conditions specified in this book as of the date it is published, and those who work in the company after this date are deemed to have accepted these principles as of their date of entry. The Ethics Committee conducts its work in accordance with the principles specified below:

- Keeps the identities of the persons making the notifications and complaints confidential.

- Conducts the investigation as confidentially as possible.
- The Board has the authority to request information, documents and evidence related to the investigation directly from the unit in question. It examines all information and documents it obtains only in a manner limited to the subject of the investigation.
- The investigation process is recorded in a written report from the beginning. Information, evidence and documents are added to the report.
- The report is signed by the chairman and members.
- The investigation is handled urgently and the result is reached as quickly as possible.
- The decisions taken by the Board are discussed and immediately put into practice.
- The relevant authorities are informed about the result.
- While performing their duties on this subject, the chairman and members of the Board act independently of the department managers they are affiliated with and the hierarchy within the organization. They can never be pressured or indoctrinated on the subject.
- If deemed necessary, the Board may seek expert opinion and may benefit from experts by taking measures that will not violate confidentiality principles during the investigation. (For example; universities, consulting firms, relevant persons/institutions, etc.).

4. RECORDS

The quality records created by the implementation of this instruction are kept in the Quality section according to the period specified in the MSL-13 document.

5. REVIEW

The responsibility for reviewing and updating this instruction belongs to the Quality Officer and the Human Resources Officer. The review is carried out at the beginning of each year in January.