

JANTSA COD OF ETHICAL CONDUCT AND APPLICATION POLICIES

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INTRODUCTION

As employees, it is the responsibility of each of us to uphold the principles of honesty and ethical business practices. We have obligations to be honest, trustworthy, and credible in our relationships with others, and to adhere to ethical business practices at every stage of our work.

The goal of our ethical code of conduct is to ensure we have a shared understanding of what is and is not expected of us in our work within the areas for which we are responsible. These efforts establish the ethical principles that define us as a company and identify practical and guiding guidelines to help us understand and follow these principles. "Doing the right thing" is the most important responsibility of all employees. Employees should adhere to the following two fundamental principles:

- Avoiding attitudes and behaviors that would harm the institution or damage its reputation.
- Acting within the framework of laws, general moral principles, and honesty.

Code of Ethics Regulation;

This document outlines the business conduct principles and requirements approved by Jantsa General Manager. The rules are designed to help Jantsa employees and managers conduct their work in accordance with Jantsa's core values and ethical standards. The rules also provide guidance for effectively preventing and detecting violations of applicable laws and regulations.

To whom do the Code of Ethics apply?

The Rules apply to the entire workforce, including full-time or part-time employees, temporary workers, contract workers, officers, managers, and senior management, and this group is referred to as "Employees." Jantsa Inc. encourages its stakeholders, including suppliers, to act in accordance with the Rules. Jantsa Inc. strives to ensure that the Code of Ethics is seen as a guide for conducting business by its business partners with whom it maintains enduring relationships, such as consultants, experts, agents, and clients.

Where do ethical codes apply?

Jantsa A.Ş. expects its employees to understand and comply with the principles and requirements set forth in these Rules in all environments, both at work and outside of working hours, that may affect the Company.

Where can I find the Code of Ethics?

The rules are available in the Jantsa A.Ş. Internal Communication and Common Area. They can also be obtained from the Human Resources Department. Additionally, you can find all our policies and commitments on the sustainability section of our website.

How are ethical rules applied?

Jantsa expects its employees, suppliers, and other stakeholders to comply with the Code of Ethics. If a violation is found, appropriate disciplinary measures may be taken. Jantsa Inc. may terminate its relationship with stakeholders who act in a manner significantly inconsistent with the Code of Ethics.

What are my responsibilities as an employee under the Law?

The Rules are an integral and fundamental part of the employment relationship of every Jantsa employee. Consequently, Jantsa Inc. expects all its employees to strictly adhere to the Rules. Any significant breach of the Rules will be taken seriously, resulting in the adoption of appropriate sanctions (which in some cases may lead to termination of the employment relationship). Accordingly, all employees are required to:

- Read and understand the Rules and attend training courses as needed.
- Adopt actions and behaviors consistent with the Rules, avoiding any conduct that could harm Jantsa Inc. or jeopardize its integrity, impartiality, or reputation in any way.
- Comply with all internal policies and procedures put in place by Jantsa Inc. to ensure compliance with the Code of Ethics or to detect violations of the Rules.
- Consult their supervisors for clarifications regarding the interpretation of the Rules.
- Report any breach of the Rules promptly and in good faith. • To fully cooperate in all investigations into rule violations, while maintaining strict confidentiality regarding the existence of the investigations.

As a manager at Jantsa A.Ş., what are my responsibilities under the Code of Ethics Regulation?

All managers within Jantsa A.Ş. must set an example in promoting compliance with the Rules and providing leadership and guidance in accordance with the code of conduct outlined in the Rules. They must act in a way that demonstrates to colleagues that compliance with the Rules is an important aspect of their work, ensuring that employees understand that work results must be achieved in compliance with applicable laws and the Rules. Managers have a responsibility to report any significant failure to comply with the Rules and to ensure the protection of those who report Rule violations.

BUSINESS ETHICS

Business ethics encompasses issues such as anti-competitive practices, corruption and bribery, money laundering, respect for confidentiality, conflicts of interest, and fraud. The Code of Ethics sets out guidelines to ensure that employees and stakeholders always adhere to the highest standards of ethical conduct.

Compliance with the law

Jantsa A.Ş. is obligated to comply with all applicable laws and regulations in its business relationships with suppliers and other business partners. Jantsa A.Ş. is not permitted to actively participate in or engage in any practices that constitute a crime, directly or indirectly, in its business relationships with suppliers and other business partners. Jantsa A.Ş. expects its customers to comply with all applicable national and supranational sanctions to adhere to these restrictions and to strictly comply with any resulting embargoes and export control measures. Jantsa A.Ş. also demands legal compliance from its suppliers and other business partners, particularly regarding antitrust issues, tax regulations, data protection and privacy, as well as the prevention of corruption and fraud.

Conflict of Interest

A conflict of interest is defined as a situation where an individual or the company they work for is faced with a choice between the duties and requirements of their employment and their own personal interests. Jantsa requires employees to make decisions based solely on objective information and in line with Jantsa's interests, and not to allow themselves to be influenced by personal interests. Employees are expected to report potential or actual conflicts of interest to management in order to determine an appropriate response.

Privacy and Data Protection

Employees are required to comply with applicable laws and regulations regarding e-privacy, data protection, and data security. Employees must take necessary measures and establish appropriate controls to adequately protect personal data, including data of employees, customers, suppliers, and business partners. Personal data, such as information about employees, must be managed in accordance with applicable data protection legislation and all applicable privacy laws in force in the jurisdictions where the information is managed.

Employees are responsible for protecting confidential, non-public information and confidential information belonging to third parties in the Group's possession, the disclosure of which could harm the Group. The following are considered confidential company information:

- Know-how and information relating to research and development.
- Product engineering.
- Product design (patented or registered and unregistered).
- Related documents such as codes, drawings, formulas, computer data, programs.
- Non-public information relating to the organization of Jantsa A.Ş.
- Confidential trade information relating to customers or other parties, including prices, strategy, and policies

Employees are required to respect the intellectual property rights of third parties and partners, such as patents, trademarks and designs, and to comply with relevant requirements under competition law. Employees must ensure that the Group possesses all necessary usage rights to prevent infringement of intellectual property rights.

Corruption, Bribery, and Illicit Payments

Employees of Jantsa Inc. commit to upholding the highest standards of integrity, honesty, and fairness in all their dealings within and outside of Jantsa, in accordance with national and international laws against corruption. Employees must reject all forms of corruption, including extortion and bribery, and all forms of illegal conduct, including fraud and embezzlement. This means that it is strictly prohibited to accept or offer gifts, invitations, favors, or payments from or to any domestic or foreign public official or private party as an encouragement to do anything dishonest, illegal, or breach of trust while conducting Jantsa's business. Examples of conduct not permitted to Employees by Jantsa Inc. are as follows:

- Jantsa A.Ş. expressly prohibits payments or in-kind contributions to political parties, politicians, public officials, civil servants, and other politically exposed individuals.
- Any payments or contributions made by Jantsa A.Ş. employees shall be delivered solely as personal voluntary contributions.

- Jantsa A.Ş. expressly prohibits facilitation payments or commissions, defined as small bribes paid to facilitate routine government transactions or fees made to secure or expedite the performance of a routine or necessary transaction to which the payer already has a legal or other right.
- Jantsa A.Ş. expressly prohibits nepotism where a Jantsa A.Ş. employee uses their position to provide preferential treatment to a relative or friend.
- Jantsa A.Ş. expressly prohibits the payment or in-kind contribution to the general manager, directors, managers responsible for preparing corporate accounting documents, auditors, and liquidators to perform or omit actions contrary to transparent financial reporting.
- Jantsa A.Ş. expressly prohibits the payment or gifting of public officials, their representatives, or any party connected with public officials with the intent to cause the official to breach their duties and provide Jantsa JSC with an improper benefit or advantage.

Cash payments should be avoided as much as possible. Payments should generally be made via bank transfer, and care should be taken to document the relevant transactions, especially the services rendered and the payments made, in writing.

Money Laundering

Jantsa A.Ş. and its employees shall not engage in or be involved in any activity that could be interpreted as money laundering or financing or facilitating criminal activity. All financial information, including necessary taxes, duties, and license fees, related to Jantsa A.Ş.'s business activities must be disclosed in accordance with applicable national and international regulations.

Anti-competitive practices

Anticompetitive practices refer to a wide range of business practices that a company or group of companies may engage in to restrict competition among companies in order to maintain or increase their relative market position and profits without having to offer goods and services at a lower cost or of higher quality (OECD). Anticompetitive behavior distorts competition.

To maintain the vital importance of a competitive market, Jantsa A.Ş. is committed to promoting fair competition, avoiding all anti-competitive practices, and respecting all laws, rules, and regulations relating to competition and transparency in business operations. Therefore, Employees must not engage in business practices that could constitute a violation of competition laws, antitrust, or other competition legislation in force in the countries where the Group operates. Employees are expected to understand that operations must always be conducted in compliance with all applicable antitrust and competition laws and regulations, and with an understanding of the importance of protecting and promoting free, fair, and open competition. To avoid restricting competition, Employees should be particularly aware of the following:

- Employees must not be involved in any competitive business decisions that attempt to restrict competition in the supply chain with Jantsa A.Ş.'s suppliers or customers.
- Employees must not formally or informally discuss issues of price, market share, bid rigging, production or supply restriction, boycotts, or unfair discrimination with competitors or suppliers.

- Employees shall not set sales or purchase prices with competitors or customers, including maximum or minimum prices, discounts, rebates, or credit terms.
- Employees shall not act in any way to divide markets or customers.
- Employees shall not exchange, collect, or disseminate trade secrets or other commercially sensitive information with competitors, suppliers, or customers.
- Employees shall not engage in any discussion or action that could be interpreted as an agreement or understanding to hinder a commercial entity's access to any market or any customer.
- Jantsa A.Ş. shall not knowingly infringe the intellectual property rights of third parties within the framework of fair competition.

Internal Control Systems and Records

The smooth running of Jantsa A.Ş.'s business requires its employees to properly manage business records trusted by our customers, investors, business partners, and government agencies. Such business records are necessary to meet legal and regulatory requirements.

Jantsa A.Ş. is required to maintain effective internal control systems. To comply with this requirement, it must maintain accurate and complete internal records of business activities, including accounting records, and ensure that the undertaking of operations and contractual commitments is authorized at the appropriate level of the organization.

Company Assets

Employees must use company assets and resources that they have access to or are in their care efficiently and solely to achieve Jantsa A.Ş.'s business goals and objectives. The use of such assets must also be managed to preserve their value. Employees are responsible for protecting Jantsa A.Ş.'s assets and resources against loss, theft, and unauthorized use or disposition.

External Activities

Employees may not serve on the boards of directors of other companies without the permission of Jantsa A.Ş., and may not engage in recurring private commercial activities, including: interfering with their own obligations to Jantsa A.Ş.

Any employment relationship or provision of services by Jantsa A.Ş. officers or employees to Jantsa A.Ş.'s business partners or Competitors requires prior written approval from the appropriate management level.

Export Controls And Economic Sanctions

Our company complies with all applicable export control laws and economic sanctions regulations and takes the necessary measures to ensure full adherence. We implement appropriate policies, procedures, and screening processes, conduct due diligence on relevant parties where required, and provide guidance and training to employees to support compliance in all business activities.

WORKERS AND HUMAN RIGHTS

Jantsa A.Ş. recognizes that workforce motivation and professionalism are crucial factors in maintaining competitiveness and ensuring customer satisfaction. Jantsa A.Ş. is committed to providing a diverse, fair, and inclusive workplace free from harassment and discrimination, and endorses principles that protect human rights. Jantsa A.Ş.'s principles are derived from the United Nations Global Compact, the International Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the International Labour Organization's (ILO) Basic Conventions. These principles highlight the importance of respect for the individual, equality, and the avoidance of all forms of discrimination.

All suppliers and partners are encouraged to comply with the human rights principles set forth in these Rules. Where a significant negative impact on human rights within the supply chain is known, suppliers are expected to exercise due diligence to stop, prevent, and mitigate such negative impacts within a reasonable timeframe.

Child Labour and Forced Labour

Jantsa A.Ş. does not tolerate any form of forced labor, modern slavery, human trafficking, or child labor. The employment age for young workers must meet or exceed the legal regulations of the country in which they operate. In any case, no employee should be under the age of 15, and any employee under the age of 18 must be appropriately assessed to ensure there is no potential for child labor exploitation. Robust checks are expected to be carried out to ensure that the ages of employees and applicants are properly verified.

Jantsa A.Ş. must ensure that all employees, including contract workers, are working of their own free will and are free to terminate their employment with appropriate notice. Jantsa A.Ş. must not be burdened by deductions or imposition of wages or expenses as part of the recruitment process. Jantsa A.Ş. must not restrict the freedom of movement of its employees by withholding their identification documents. Jantsa A.Ş. also undertakes not to establish or maintain business relationships with suppliers or partners found to use child labor or any form of forced labor, as defined above.

Freedom of Association and Collective Bargaining

Jantsa A.Ş. is committed to ensuring freedom of association and the right to collective bargaining. Jantsa A.Ş. recognizes and respects the right of the workforce to be represented by unions or other representatives established in accordance with applicable local legislation and practices. Jantsa A.Ş. is committed to cooperating with employee representative organizations in a transparent and fair manner and to establishing a meaningful and constructive relationship with unions.

Equal Opportunities

Jantsa A.Ş. is committed to providing all its employees with equal opportunity and diversity in employment and career development. Everyone is valued for their contributions to the Group. The principle of equal pay for equal value should apply regardless of gender, and decisions regarding recruitment, training, and career development should be based solely on an individual's skills, experience, and potential.

In all aspects of the employment relationship – including recruitment, training, compensation, promotion, transfer, and termination – Jantsa A.Ş. must ensure that employees are treated according to their ability to fulfill the requirements of the job, avoiding all forms of discrimination, and in particular discrimination based on:

Ethnic origin, skin color, gender, pregnancy and motherhood, sexual orientation, political opinion, disability, age, nationality, religion, or belief.

Jantsa A.Ş. aims to proactively support the individual life circumstances of its employees by utilizing flexible working environments and working hours where appropriate for the relevant activity.

Harassment

Jantsa A.Ş. considers any form of harassment or behavior, whether inside or outside the workplace, that aims to or has the effect of violating the dignity of any individual to be unacceptable. No form of violence, intimidation, bullying, or oppression will be tolerated in the Jantsa A.Ş. workplace.

Work Environment

All Jantsa A.Ş. employees must strive to maintain a good and collaborative working environment where everyone's dignity is respected. For example, all Jantsa A.Ş. employees:

- Must not work while under the influence of alcohol or drugs.
- Must be sensitive to the needs of individuals who may be physically harmed by the effects of passive smoking and must refrain from smoking in places where smoking is legally prohibited.
- Must avoid behavior that could create a frightening or aggressive atmosphere for colleagues or subordinates.

Salary and Working Hours

Jantsa A.Ş. adopts the principle that all its workforce must have legal working conditions.

Regarding working hours, wages and benefits, social security benefits, overtime and paid leave, Jantsa A.Ş. employees must comply with the applicable legislation and practices. Wages must be paid in full for services rendered and cannot be unlawfully withheld.

During recruitment or promotion, employees must receive complete and transparent information about the terms governing their employment relationship.

No employee of Jantsa A.Ş. shall accept or solicit promises or transfers of money or goods or benefits, incentives or services that may be designed to encourage the recruitment or transfer or promotion of an individual as an employee.

Management shall ensure that proactive measures are taken to prevent discrimination during any recruitment and in professional development and promotion processes.

HEALTH AND SAFETY

Workplace Health and Safety

Jantsa A.Ş. adopts the principle that all its workforce has the right to a safe and healthy working environment and protective equipment, and accepts the employers' obligation to protect the health and safety of its workforce. Jantsa A.Ş. is aware that industrial processes can be inherently hazardous and that accidents or occupational diseases can have serious or fatal consequences. Therefore, health and safety is Jantsa A.Ş.'s top priority, and it promotes and supports a culture of accident prevention and risk awareness in the workplace.

All decisions made by Jantsa A.Ş. must respect workplace health and safety, and Jantsa A.Ş. requires its workforce to strictly adhere to safety rules and to always be vigilant to identify and address potential risks immediately. Jantsa A.Ş. aims to provide good working conditions at the industrial level according to the principles of good hygiene, industrial ergonomics, and individual organizational and operational processes. Jantsa A.Ş. requires management to focus on disseminating a culture of accident prevention and risk awareness among the workforce and to actively promote health and safety through regular training courses and information sessions. Employees are personally responsible for complying with the preventive measures determined by Jantsa A.Ş. for the protection of their health and safety, as communicated to them through specific policies, procedures, guidelines, instructions, training, and information. Each employee is considered responsible for the proper management of safety and must not expose themselves or others to hazards that could cause injury or harm. Joint worker and management health and safety committees or meetings are mandatory for all Jantsa A.Ş. companies. Jantsa A.Ş. companies are expected to comply with the applicable local health and safety laws and regulations in the countries in which they operate.

Jantsa A.Ş. suppliers are encouraged to make health and safety management a priority, comply with local legislation wherever they operate, and implement a certified health and safety management system. Suppliers, subcontractors, and business partners are expected to comply with Jantsa A.Ş. safety rules while on Jantsa A.Ş. facilities and ensure that their activities are fully compliant with Jantsa A.Ş.'s policies and procedures during their time on site.

Health and Safety Management System.

Jantsa A.Ş.'s production facilities are expected to operate an effective and certified health and safety management system according to ISO 45001 or similar to minimize health and safety risks and improve working conditions for the workforce and subcontractors working in the field. Where a manufacturing company is not certified, it must set a target date for auditing and work towards certification accordingly.

Jantsa A.Ş. management must ensure regular inspections or audits are conducted to ensure equipment safety and take immediate action to correct any deficiencies identified.

Jantsa A.Ş. is aware that the design of its products and the materials used to manufacture them can affect the performance of the vehicle in which they are incorporated. Jantsa A.Ş. is committed to manufacturing and selling products that meet the highest standards in terms of safety performance and are fully compliant with legal and regulatory requirements. Therefore, Jantsa A.Ş. employees must carefully consider potential customer health and safety issues when designing or manufacturing products. Any potential negative health and safety effects of Jantsa A.Ş. products on end or intermediate customers should be eliminated whenever possible, in full cooperation with the relevant customer.

ENVIRONMENTAL PROTECTION

Jantsa A.Ş. environmental protection requirements aim to protect natural resources as well as prevent environmental damage caused by economic activities when it occurs. Environmental protection encompasses a wide range of issues such as air, soil and water pollution, conservation of resources such as water, promotion of renewable and clean energy sources and safe management of hazardous materials. Jantsa A.Ş. must comply with all environmental laws, regulations and official agreements in force in the country and, where required by the Rules, go beyond these local legal requirements.

Environmental Protection in Work Processes

Jantsa A.Ş. expects its work processes to be based on a systematic and holistic approach to environmental protection according to the precautionary principle. This means that environmental protection should be incorporated into business conduct and management systems and should strive to prevent, or minimize if this is not possible, environmental threats that could potentially result in environmental damage. The assessment of environmental impacts is expected to be an integral part of decisions regarding resource use, input materials, design and production of products. Jantsa A.Ş. is committed to continuously improving the environmental performance of its production processes and promoting the development and dissemination of environmentally friendly technologies.

Environmental Management System

Jantsa A.Ş. production facilities are expected to operate an effective and certified environmental management system according to ISO 14001 or similar standards to systematically minimize their resource consumption and environmental impact. Where a production company does not have certification, it is required to set a target date for auditing and work towards certification accordingly.

Greenhouse Gas ('GHG') Reduction

Jantsa A.Ş. is committed to the Paris Agreement, and therefore contributing to a decarbonized economy is one of its top priorities. This means that Jantsa A.Ş.'s main focus is on reducing greenhouse gas emissions, particularly CO2 emissions, from its operations by implementing effective avoidance and mitigation measures, minimizing energy waste, reducing energy consumption, and reducing energy consumption through technology and equipment upgrades. Where possible, Jantsa A.Ş. will implement innovative technical solutions to reduce or eliminate greenhouse gases and enable the use of renewable energy sources. Jantsa A.Ş. will regularly monitor the targets for

Scope 1 and 2 emissions to fulfill our commitment and will work closely with its customers on the management and measurement of Scope 3 emissions when it is within the Group's control.

The group's suppliers are encouraged to have greenhouse gas reduction targets, and Jantsa A.Ş. promotes the adoption and sharing of sustainable practices among its business partners. Jantsa A.Ş. is expected to make greenhouse gas reduction an integral part of its purchasing decisions. The purchase or production of energy required for Jantsa A.Ş.'s operations should come from low- or zero-carbon sources such as hydroelectric, wind, solar, (when available and economically feasible).

Jantsa A.Ş. should use natural resources such as water and technical resources such as raw materials and energy as economically as possible in its operations. Where possible, technically innovative solutions should be implemented to reduce the use of natural resources.

Jantsa should actively strive to replace consumables and packaging with materials that are recyclable or made from recycled materials. Where bio-based and renewable materials are available and economically and technically feasible, Jantsa JSC is expected to use them to eliminate plastic or non-recyclable materials. Recycling of materials should be carried out systematically where possible. Jantsa is encouraged to proactively adopt technologies or practices to recycle or reuse water and implement rainwater harvesting systems. Wastewater must be assessed in accordance with local legislation to ensure it meets quality requirements before discharge.

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Hazardous Materials and Waste

When handling, storing, or transporting chemicals or hazardous materials, Jantsa A.Ş. is expected to implement rigorous specific procedures and relevant identification and labeling practices to ensure that health, safety, and environmental risks are minimized. Risks arising from such materials, such as soil and air pollution and water contamination, should be reduced as much as possible. Appropriate instructions should be given to the workforce accordingly.

Jantsa A.Ş. is expected to implement appropriate waste management systems and procedures to ensure the correct classification, collection, storage, processing, and disposal of hazardous waste. Technical and organizational measures should be taken to prevent contamination of surface or groundwater. Waste cannot be disposed of illegally under any circumstances. Jantsa A.Ş. must comply with legal regulations.

Biodiversity

Jantsa A.Ş. must respect protected and conservation areas and not initiate activities or plan related facilities in protected areas. Jantsa A.Ş.'s business activities must not contribute to or benefit from the illegal transformation of natural ecosystems, such as illegal deforestation. Jantsa A.Ş. encourages local participation in greening initiatives such as planting vegetation and promotes the adoption of green spaces and tree planting around its facilities.

EXTERNAL RELATIONS

Jantsa A.Ş. and its Employees are committed to conducting their relationships with third parties in good faith, with fairness and transparency, and with due respect to the Group's core values as set forth in these Rules.

Customers

Jantsa A.Ş. aims to fully meet the expectations of its customers. Employees are required to aim to exceed customer expectations and continuously improve the quality of its products and services. Treating customers fairly and honestly at all times is essential, and all relationships and interactions with customers must be characterized by honesty, professional integrity, and transparency. Jantsa A.Ş. must not discriminate unfairly in its relations with customers and must always manage its relationships in accordance with the Rules and the individual Codes of Conduct or Sustainability Policies communicated to it by its customers.

Suppliers and Responsible Sourcing

Suppliers play a fundamental role in enhancing Jantsa A.Ş.'s overall structural competitiveness. To consistently maintain the highest level of customer satisfaction, Jantsa A.Ş. selects its suppliers using appropriate and objective methods based on quality, innovation, cost and services offered, as well as social and environmental performance and the values set forth in the Rules.

Jantsa A.Ş. is committed to a policy of responsibly and sustainably sourcing production materials, equipment and services. Jantsa A.Ş. aims to use only production materials whose extraction, production, transportation, trade, processing and export do not directly or indirectly contribute to human rights violations, health and safety issues or compliance breaches. Accordingly, Jantsa A.Ş. encourages its suppliers to act in accordance with the Rules or a similar set of standards and encourages its subcontractors to do the same. Respect for the Rules or a similar set of standards is an integral part of procurement decisions. Jantsa A.Ş.'s suppliers should communicate appropriately with their direct suppliers to promote compliance within their sphere of influence. All suppliers are expected to comply with applicable laws and regulations, particularly those relating to fair competition, antitrust, environment, labor, and human rights. Suppliers are expected not to commit or contribute to any serious human rights violations, cruel, inhuman, or degrading treatment, or crimes against humanity. Suppliers of materials from conflict-affected and high-risk areas must have due diligence processes in place in their supply chains to minimize the risk of actual or potential adverse impacts. Jantsa A.Ş. managers and employees are expected to establish and maintain stable, transparent, and cooperative relationships with suppliers. Jantsa A.Ş. policies and practices will prioritize suppliers who uphold a high level of corporate social responsibility. Jantsa A.Ş. reserves the right to take appropriate measures, which may ultimately lead to suspension or termination of the supply relationship, if it becomes aware that a supplier is substantially failing to comply with the Rules. It is strictly prohibited to receive or offer any sum, benefit, or advantage from or by a supplier that would affect a normal fair sourcing or business relationship. Employees are not permitted to ask for or be encouraged to offer gifts or entertainment from a supplier. Accepting such a gift or hospitality may be perceived as bribery.

Banks and Other Financial Institutions

Relationships with banks and other financial institutions must be transparent and conducted in accordance with the Rules or a similar set of standards. Jantsa JSC is committed to engaging only with lenders who are highly fair and transparent and will not enter into financial agreements with or borrow from unreliable financial institutions.

Public Institutions

Relations with public institutions must be transparent and conducted in accordance with the Rules. No interaction with public institutions should aim to obtain or attempt to obtain unfair advantages for Jantsa A.Ş.

Jantsa A.Ş. intends to fully cooperate with regulatory and official bodies within the scope of its legitimate activities.

If Jantsa A.Ş. is subject to legitimate audits by public authorities, full cooperation is expected.

Any lobbying activity undertaken by Jantsa A.Ş. must be conducted only as permitted by applicable law, in strict compliance with local legislation, and at all times in full compliance with the Rules. Jantsa A.Ş. is committed to contributing to technological progress and collaborating with public institutions, universities, and other organizations to research and develop innovative solutions for sustainable mobility and related technology.

Corporate Communication and Information

Jantsa A.Ş. values honest and open communication with its workforce, customers, stakeholders, and the communities in which it conducts its business. Therefore, communication and information – including through the media – must be regulated according to clear, uniform criteria that take into account both the needs of the business and the Rules, as well as applicable legal requirements. Information provided by Jantsa A.Ş. must be complete, accurate, and reliable and coordinated across the company where it has a significant impact. Only Senior Management (Board of Directors and CEO) at Jantsa A.Ş. has the right to speak on behalf of the company. Employees responsible for communicating business-related information in the form of speeches, participation in conferences, publications, or any other presentation must obtain prior approval from their duly designated company department manager or senior management.

ACCOUNTING AND INTERNAL MONITORING

Jantsa A.Ş. will maintain high standards of financial planning and control with accounting systems that are consistent with applicable accounting principles and guidelines and compliant with current laws. Jantsa A.Ş. will: Ensure that all transactions are duly authorized, verifiable and legitimate in order to operate with maximum transparency in line with best business practices.

- Ensure that all transactions are recorded, accounted for and duly documented in a timely and accurate manner in accordance with applicable accounting standards and best practices.
- Deliver complete, accurate, reliable, clear and comprehensive financial reports in a timely manner.
- Identify, analyze and manage risks related to Jantsa A.Ş.'s operations.
- Establish rigorous business processes to ensure that management decisions (including those related to investments and divestitures) are based on sound economic analysis, including a prudent risk assessment, and that company assets are used appropriately.

- To ensure that financial, tax, and accounting decisions are made by the correct management level and in full compliance with applicable laws.

Jantsa Inc. requires employees to maintain accurate and timely records of financial and commercial transactions, along with adequate supporting documentation. Disorganized accounting record keeping is a violation of the Rules and is considered illegal in most jurisdictions. Therefore, any employee is prohibited from preparing records that may lead to inaccurate or incomplete information, including:

- Recording incorrect transactions.
- Incorrect recording or inadequate documentation of transactions.
- Failure to record commitments, including warranties, that may create liabilities or obligations for Jantsa A.Ş.

IMPLEMENTATION

The management of Jantsa A.Ş. is responsible for ensuring that the Rules are understood and implemented by the workforce. Management must ensure that the requirements of the Rules are implemented within their areas of responsibility.

The management of Jantsa A.Ş. must regularly conduct training on the Rules and supporting policies.

Employees are encouraged to seek guidance from their managers or the Human Resources department regarding any doubts they may have about the Rules and appropriate conduct. Responses to requests for clarification should be given promptly without any risk of sanctions or retaliation.

Major breaches of the Rules must be investigated by senior management, and any consequences must be consistent with applicable laws and employment contracts. False accusations of a breach of the Rules also constitute a breach of the Rules.

Breach of the Rules may lead to the initiation of legal proceedings, termination of the trust relationship between Jantsa JSC and the employee or partner, and contractual and legal consequences applicable in the country.

Significant exceptions to the Rules must be clearly justified and approved by the General Manager. An ethics violation reporting email address has been created for employees to report rule violations (etiket@jantsa.com.tr).

ÇAĞLAYAN SEVEN
GENERAL MANAGER
05.01.2026

