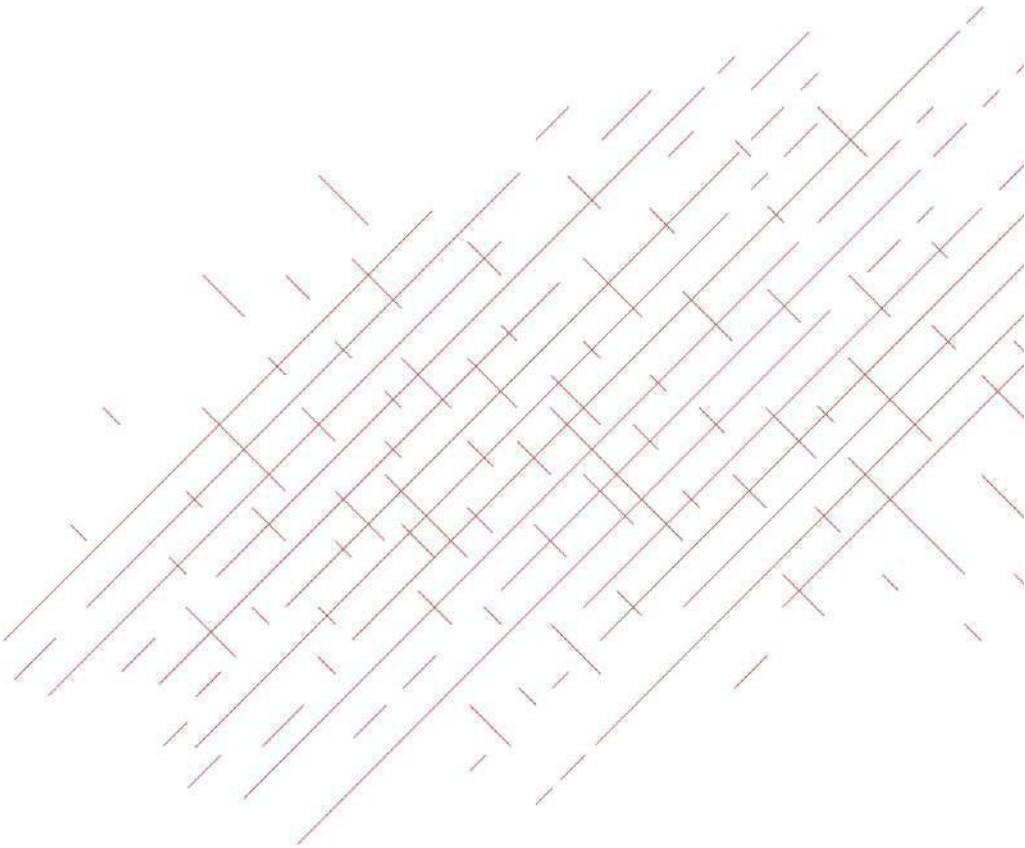
Hitit

ETHICAL PRINCIPLES

28 December 2022



Your team.

1. OUR ETHICAL PRINCIPLES

1.1. Compliance with the Legislation

We comply with existing national and international legal rules and internal regulations in all countries where we have operations. In every country where we do business, we act in accordance with the law, and where the law is unclear, we act in accordance with our Code of Ethics and, where necessary, in consultation with the competent authorities.

We record all our commercial activities and records in a complete and clear manner in accordance with the applicable legislation and ensure that the agreements made with third parties are clear and understandable in accordance with the legislation, our Code of Ethics and policies.

We recognise that in addition to local legislation, Hitit may be required to comply with international regulations under its contractual obligations. We act with the awareness that our non-compliant actions may be subject to different sanctions, including administrative fines.

In our relations with regulatory bodies and institutions, we show sensitivity to open, complete, accurate and timely communication, and we approach domestic and foreign institutions and organisations without discrimination while carrying out our activities and fulfilling our legal obligations.

In our relations with investors and all our stakeholders, we act in accordance with all applicable laws, regulations, rules, rules, principles and internal regulations, international legal rules and our Code of Ethics without discrimination.

1.2. Personal Data, Privacy and Protection of Internal Information

Our confidential information is protected by our company policies, legislation and laws of the countries where we do business and contracts with third parties. We strictly comply with all our policies aimed at protecting privacy.

Confidentiality of all commercial and personal information regarding our employees and stakeholders is essential. We process this private and confidential information to the extent permitted by the legislation as required by our business and duty, and during the processing process, we comply with the relevant laws, legislation and regulations in accessing and using this data, and where necessary, we share it only with the relevant authorised persons with the permission of the data subject, and we do not share it with third parties unless there is an obligation to disclose it as required by the legislation.

We pay utmost attention to data confidentiality and security issues when using all kinds of information technology resources and electronic communication tools, and we act with the awareness that the confidentiality of passwords, passwords and user codes used to access information is the responsibility of the user.

We do not take data, information and documents out of the Company that may harm the Company's activities and reputation, put it in a difficult situation in terms of competition, or violate the confidentiality of private information.

We know that it is a legal offence (the offence of information misuse) to provide benefits to oneself or someone else by taking actions or transactions based on information that may affect the prices, values or decisions of investors about the capital market instruments issued by the Company and which has not yet been disclosed to the public ("inside information"), and we inform our employees to prevent this. We take all necessary measures to ensure the protection and confidentiality of insider information; we refrain from engaging in business and transactions that may result in market abuse, market fraud or information misuse in accordance with capital market regulations.

1.3 Employees

We respect human rights and the dignity of employees, we adopt a trusting communication approach to our employees within the framework of the principles of equality and honesty, we exhibit ethical behaviour full of goodwill and respect, and we avoid actions that humiliate honour and pride.

We provide our employees with a respectful, fair working environment that guarantees human dignity, includes working hours that observe the balance between work and private life, and prioritises occupational health and safety. Employees must comply with Hitit occupational health and safety procedures as well as legal regulations in this regard.

We follow global developments in the field of human resources management, develop and improve the working environment in a way to increase the loyalty of our employees with a dynamism appropriate to the different needs of the sector and functions. We do not discriminate on the basis of religion, language, race, ethnic origin, gender and sexual orientation in all human resources processes from recruitment to wage management.

We attach importance to the full and effective participation of women in the decision-making processes of economic and social life.

We carry out our activities in accordance with the minimum age provisions specified in the laws,

We do not employ child labour in our company, subsidiaries and foreign offices.

We ask employees to take their responsibilities and ensure their participation in the decision-making process when necessary.

1.4 Relations with Stakeholders

- **Shareholders**

We aim to protect the rights and interests of our shareholders as determined by law. We adopt corporate governance principles while conducting our operations.

We develop and realise an honest, transparent, sustainable reporting system that complies with legal regulations and rules on the basis of commercial and financial discipline. We regularly provide information to the necessary persons, institutions and organisations. In our disclosures to the public and our shareholders, we provide timely, complete, accurate and understandable information about our financial statements, strategies and investments within the scope stipulated by the legislation.

We care about maintaining the trust of our shareholders in our Company. We make our decisions based on economic data, use our resources and assets effectively and efficiently with an understanding of financial discipline and accountability, and implement sustainable and growth-oriented value-creating strategies by avoiding unnecessary and unmanageable risks.

We take care to make our investments in areas that will increase our competitiveness and growth potential without disregarding sustainable profitability.

We comply with legal regulations regarding the purchase and sale of our Company's shares and avoid situations that may create conflicts of interest.

- **Our Customers, Suppliers and Business Partners**

We pay attention to be accurate, consistent and reliable in our relations with those who have commercial business relations with the Company and our customers, and we execute product/service agreements in accordance with the relevant international and local legislation and the contracts we are a party to, within the framework of Company policies and principles.

We act honestly, respectfully and fairly in our relations with our suppliers and business partners in accordance with the relevant international and local legislation.

While conducting our relations during and after the determination of suppliers and business partners; we are transparent, we do not accept elements (gifts, benefits, etc.) that may adversely affect our objective decision-making competencies, and we act in a way that does not allow the formation of impressions that there is a relationship of interest.

We expect our suppliers and business partners to carry out their activities in accordance with laws, regulations and our Company's Ethical Principles and values. It is our principle to establish mutually beneficial relationships with all our suppliers and business partners. It is our principle to establish mutually beneficial relationships with all our suppliers and business partners.

1.5 Competition

We recognise that our Company and our subsidiaries, business partners and employees must comply with applicable local and international competition legislation in order to protect competition. We are aware that violations of Competition Law will lead to heavy fines and other sanctions against both our company and employees.

1.6 Public Institutions, NGOs and Politics

We can work with governments directly or through non-governmental organisations (NGOs) on legislation that affects our activities. While carrying out our activities,

we act with the principle of standing at an equal distance to public institutions and organisations and non-governmental organisations, and we do not support any political party, political opinion and interest. We do not use Company resources for political activities. In addition, we do not allow demonstrations, propaganda and similar activities for political purposes within the Company's work areas, but we respect the voluntary participation of our employees in legal political activities. We support our employees to take roles in NGOs.

1.7 Media / Social Media

We establish an open and transparent dialogue with the media. We carry out all our content activities such as opinions, statements, news and interview requests from media organisations within the knowledge of our General Manager. We do not include information that would mislead the public in our statements to the media. We do not make public statements as an employee or manager other than the spokespersons of the organisation. In our statements, we do not include expressions that may damage the reputation of the institution, incompatible with the corporate culture, and we do not use discriminatory expressions, political, hateful and insulting discourses.

When sharing on social media, we avoid sharing content that may lead to disputes and uncertainties on corporate issues and sharing information and photos that violate the privacy rules of companies. In our social media posts, we always act in accordance with legal regulations and Company Ethical Principles and related policies.

We expect our employees to show sensitivity to our Company principles, values and reputation in all digital media and communication channels, especially social media. We act by taking into account that posts made in social media applications with limited access or closed group correspondence will become public when they are shared in environments accessible by everyone. In this context, social networking sites, blogs, dictionaries, In electronic media that can be shared outside the company in the posts we make, we avoid using expressions that may give the impression that third parties are sharing on behalf of the Company. We do not forget that the personal shares we make may be associated with the organisation we work for by third parties and we act accordingly.

We do not share unconfirmed information about the Company on social media, except for official statements, and we know that it is essential to protect confidentiality. Accordingly, we expect our employees to act responsibly and diligently in accordance with the Code of Ethics.

1.8 Social Responsibility, Volunteering, Donations

We take part in projects that will contribute to the life and development of the society, we believe that education, culture, arts and sports are the most important elements in the development of a society, we support various educational, cultural, artistic and sports activities for the development of the societies we are in.

We make contributions to support social development in the geographies where we operate, carry out donation and sponsorship processes transparently, and ensure that these activities do not conflict with Company values or commercial interests.

We do not donate or sponsor the activities of our corporate donations and social support to projects, institutions and organisations that may damage the reputation of the Company, political activities and persons and organisations associated with these activities, private accounts and profit-oriented organisations, organisations that discriminate on the basis of gender, language, religion, race, colour, age, nationality and difference of opinion. Our employees cannot make corporate donations and sponsorships on behalf of our Company in line with their individual interests.

1.9 Conflict of Interest

We avoid conflicts of interest and situations that appear to be conflicts of interest. We do not allow our personal and financial interests to conflict or potentially conflict with the interests of our company.

While conducting our relations with our stakeholders; we are transparent, we do not accept gifts that may adversely affect our objective decision-making competencies, and we act in a way that does not allow the formation of impressions that there is a relationship of interest.

1.10 Prevention of Laundering Proceeds of Crime and Global Sanctions

The process of integrating the proceeds obtained through illegitimate means into the financial system in order to make it appear as if they were obtained through legitimate means is called laundering of proceeds of crime. As a company, in accordance with national and international legislation, we avoid commercial transactions that are laundering the proceeds of crime, therefore, before entering into a business relationship with third parties, we make the necessary due diligence to get to know the relevant party.

We also encourage our employees to comply with applicable anti-corruption and anti-money laundering laws and regulations

we are obliged to act in accordance with the provisions of laws and regulations.

Some countries with which we do business may have restrictions on other countries, companies and individuals. Violations of these restrictions could have serious consequences that could directly affect our business, such as administrative fines, cancellation of our import-export licences or our ability to supply goods and services. We therefore monitor economic sanctions, boycott and embargo and corruption laws and regularly review the needs and requirements in this regard.

1.11 Anti-Bribery and Anti-Corruption

We do not provide benefits to domestic or foreign government officials and other third parties to obtain an illegitimate benefit.

We know that bribery and corruption is a legally punishable act as well as business ethics, and we comply with local and relevant international laws and regulations and company policies against bribery and corruption in the countries where we do business.

We hold all our employees responsible for complying with local and relevant international anti-bribery and anti-corruption legislation and relevant Company policies, and we expect our stakeholders to act in accordance with the relevant regulations.

None of our employees may offer, give or accept gifts or payments that could be perceived as bribes.

All our accounting records accurately, completely and clearly reflect the relevant expenditures. No hidden, unrecorded accounts and assets are included in our financial systems.

1.12 Environment and Sustainability

We conduct all our activities and investments in harmony and sensitivity with the environment. Our management approach is sustainable and environmentally sensitive.

Protecting nature in compliance with environmental legislation is part of our responsibility towards future generations in the long term.

We rapidly adapt to global and local changes; we implement a sustainability approach shaped by our commitment to society, the environment, legislation and Ethical Principles. We adopt an understanding that considers the needs of future generations while doing things that will benefit today's society.

2. Compliance with Ethical Principles and Complaint

Company employees are obliged to comply with the Code of Ethics while carrying out their duties. We expect our employees to act with their personal conscience and common sense, in addition to compliance with laws and regulations, this Code of Ethics, and obligations arising from other Company procedures, policies and regulations. We encourage our employees to report non-conformities and be a voice for our values.

For the effective implementation of the Code of Ethics, an Ethics Committee has been established to evaluate the complaints and notifications on this issue and the issues that will fall within the scope of the Code of Ethics objectively, fairly and in accordance with the purposes specified in the rules. The Ethics Committee is selected in a way to ensure impartiality and an environment for discussion and to reach the fairest conclusion together. In this context, it is chaired by the General Manager and consists of a total of 4 (four) members, including the top managers of the Human Resources and Legal departments, and 1 (one) member at least at the level of Director, who is determined by the General Manager and reports directly to him. When necessary, the Chairman of the Ethics Committee may also invite senior executives of the company to the extent of their interest in the issues on the agenda of the Ethics Committee.

We inform our employees at all levels working within our company about the Ethical Principles and responsibilities related to these principles as an integral part of their employment contracts, we obtain a commitment that the principles have been read and understood, and we keep them in their personal files.

If necessary, we apply the relevant sanctions to the violations that are proven to be true . In this context, we apply the provisions and sanctions of the Company Disciplinary Regulation for those who violate the Code of Ethics, without prejudice to the legal provisions and sanctions. We also evaluate the status and performance of employees in terms of compliance with the Ethical Principles, including the Personnel Regulation.

All misconduct witnessed by employees or reported to them by managers can be reported to the Ethical Principles hotline via e-mail (etik@hititcs.com) for the submission of the application. You can reach Hitit Ethics Hotline Privacy Notice from the link.

The notification link in question is a special link only for the purpose of reporting issues that are not considered to be in compliance with the Ethical Principles. The Ethics Committee is authorised and responsible for the examination, evaluation and resolution of complaints, denunciations and allegations received by the Ethical Principles Hotline.

It is essential to keep the identity of the employees who report the violation confidential. The Company prevents retaliation among employees following a complaint or report and the employee who made the complaint or report from being subjected to maltreatment or harmed and ensures that a report is made in confidence.

These Ethical Principles have been adopted and put into practice with the Board of Directors decision dated 28.12.2022 and numbered 2022/39 and disclosed to the public on the corporate website of the Company.

The Turkish version shall always prevail in case of any discrepancy or inconsistency between the Turkish version and its English translation.