



HUMAN RIGHTS, ETHICAL PRINCIPLES AND CODE OF CONDUCT

No: P11

Sayfa: 10

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1. SUBJECT AND SCOPE

Ethical Principles and Code of Conduct of Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş. include the principles required to be respected by our company's employees while fulfilling their duties, and the principles related to the working order. The purpose of these principles is to outline the basic rules required to be respected and to prevent any disputes and conflicts of interest that may occur between the employees, business partners, customers, and our organization.

2. FUNDAMENTAL PRINCIPLES

All employees, business partners, suppliers and customers must do their part by observing the fundamental principles specified in this document for their relations and business of any kind in order to keep the reputation of Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş. and its shareholders at the highest level. Our employees should act on the basis of diligence and loyalty in situations and conditions not covered by these rules.

The Code of Conduct is provided under 4 main titles in this document:

A-MANAGEMENT

B-WORKING CONDITIONS AND HUMAN RIGHTS

C-HEALTH, SAFETY AND ENVIRONMENT

D-BUSINESS ETHICS

3. DEFINITIONS AND ABBREVIATIONS

This section briefly describes the special terms, concepts, and abbreviations used in the Policy.

3.1 Ditaş: Means Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş.

3.2 Senior Management: Means Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş. Executive Board, Chief Executive Officer.

3.3. Document: Means Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş. policies, regulations, procedures, written procedures of business processes created as open access for the relevant employees, and any other similar written texts.

3.4. Document Name: Means the subject which the document is related to.

3.5. Employee: Means Ditaş Doğan Yedek Parça İmalat ve Teknik A.Ş. personnel.

3.6. Service Provider: Means the personnel of the company (supplier, subcontractor, customer, etc.) which Ditaş gets services from or which Ditaş provides services to. 3.7 "UN" means the international organization of the United Nations.

3.8 "UN Global Compact" consists of 10 principles determined in the fields of human rights, working conditions, environment and anti-corruption. These principles have been prepared with a guiding perspective for companies and organizations to achieve higher goals in terms of sustainability and risk management, thus contributing to increased productivity, employee motivation and loyalty, brand awareness and access to new markets.

3.9 "Universal Declaration of Human Rights" is a milestone document in the history of human rights. Drafted by representatives with different legal and cultural backgrounds from all regions of the world, the Declaration was proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations.

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3.10 "International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work" was adopted in 1998, and all members declare that they are liable, in good faith, to respect, improve and support the principles and rights in the following four categories even though they haven't approved the relevant conventions. The categories are as follows:

- Freedom of association and the effective recognition of the right to collective bargaining,
- The elimination of forced or compulsory labour,
- The effective abolition of child labour,
- The elimination of discrimination throughout employment.

3.11 The European Convention on Human Rights (ECHR) is the text agreed upon by the members of the Council of Europe to collectively guarantee the rights contained in the Declaration of Human Rights on 4 November 1950.

3.12 "Human Rights" represent rights inherent to all people, regardless of gender, race, color, religion, language, age, nationality, different thoughts and include the right to a free and dignified life.

4. MANAGEMENT

4.1. Board of Directors

The Board of Directors is responsible for the senior supervision of the determination and operations mechanisms of notification, inspection, and sanction in case this Policy, rules, and regulations are not respected.

4.2 Executive Board

This Ethical Principles and Code of Conduct document has been approved by the Executive Board. The Executive Board is responsible for the preparation, development, update, and execution of this Policy. It is responsible for taking necessary measures to ensure the compliance of employees with the principles of the Policy;

For submitting the matters against the Policy to the Internal Audit Department with the purpose of inspection; and

For taking necessary measures for the compliance of outsourcing companies and business partners with the Policy.

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For submitting the matters against the Policy to the Internal Audit Department with the purpose of inspection; and

For taking necessary measures for the compliance of outsourcing companies and business partners with the Policy.

4.3. Human Resources Department

The Human Resources Department is responsible, on behalf of the Executive Board, for the preparation, development, and update of this Policy. The Human Resources Department assesses this Policy in terms of its actuality and development needs, when necessary, and makes suggestions to the Senior Management. The Human Resources Department is responsible for executing this Policy and carrying out studies to develop it when necessary.

The Human Resources Department Manager is responsible for internal distribution of the document prepared.

4.4. Ditaş Employees

All Ditaş employees are responsible for adhering to and complying with Ditaş policies, regulations, and procedures; Working in compliance with the legislation in force; and

Notifying the Human Resources Department of any behavior, action or application against the Policy.

4.5. Outsourcing Companies and Business Partners

Outsourcing companies and business partners are obliged to comply with the principles of the Policy and other relevant regulations, and works with persons and/or organizations failing to comply with the same are terminated.

4.6 Information Systems Department

The Information Systems Department Manager is responsible for publishing prepared documents on the corporate portal.

4.7. Financial Affairs Department

The Financial Affairs Department is responsible hereunder for regulating the relations of Ditaş with its corporate investors, portfolio managers, analysts, and existing and potential shareholders, and for providing public information applications simultaneously and transparently to all parties concerned. The Financial Affairs Department is responsible for publishing prepared documents on the website.

5. WORKING CONDITIONS AND HUMAN RIGHTS

Ditaş A.Ş. acknowledges that all people should be treated with respect and dignity as per International Labour Organization, Universal Declaration of Human Rights and the Constitution of Turkey and Labor Law No. 4867. Employers have a significant effect on the well-being of their employees and therefore have a great responsibility in this regard. Ditaş A.Ş. and its stakeholders are responsible for implementing human rights standards wherever they operate.

5.1. Non-Discrimination

Ditaş A.Ş. undertakes to approach all employees and employee candidates equally in all recruitment and employment processes, regardless of language, color, race, gender, religion, age or sect. Ditaş A.Ş. undertakes to act on the basis of equality in development processes of its employees, career opportunities, management of wages and benefits.

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5.2. Harassment

Ditaş A.Ş. undertakes to provide its employees with a working environment free of violence, harassment and other disturbing conditions arising from internal and external threats. Therefore, Ditaş A.Ş. shows zero tolerance for all kinds of physical, verbal, sexual or psychological harassment, bullying and abuse.

5.3. Zero Tolerance for Child Labor and Forced Labor

Child labor is unacceptable. Ditaş A.Ş. strongly opposes child labor, which poses physical and psychological threats to children and prevents their rights to education. Also Ditaş A.Ş. opposes all forms of forced labor, which is labor without the worker's consent under threat, and undertakes that such a work environment will not be present.

Ditaş A.Ş. adopts zero tolerance policy towards slavery and human trafficking as per conventions and recommendations of International Labor Organization, Universal Declaration of Human Rights and UN Global Compact and expects all its business partners to act accordingly. Child labour is unacceptable, and unless exceptions apply, children under the minimum age of 15 are not directly or indirectly employed. In case there is any child working at Ditaş A.Ş., Ditaş A.Ş. undertakes the responsibility for determination of the measures to protect the affected child.

5.4. Young workers

Ditaş A.Ş. ensures that legal young workers under the age of 18 do not work overtime or at night and are protected against working conditions that are harmful to their health, safety, morality or development.

5.5. Wages, Benefits and Working Hours

Ditaş A.Ş. performs the determination of wages and benefits in a competitive manner according to the local labor market and relevant industries or in accordance with the standards agreed within the scope of the collective bargaining agreement, if any. All benefits and wages are paid regularly in a transparent manner in accordance with applicable laws and regulations.

Ditaş A.Ş. undertakes to follow and implement legal regulations within the scope of working hours and conditions. It provides a safe workplace environment for its employees and pays attention to establishing an efficient work-life balance by enabling them to take regular breaks and leaves.

5.6. Freedom of Association and Collective Bargaining

Employees have the fundamental right to freely, voluntarily and without interference, to become a member of trade unions and associations and to form and to participate in employee representation of their choice, and to bargain collectively.

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5.8. Modern Slavery

Modern Slavery refers to activities resulting in an abhorrent abuse of human rights and consists of slavery, captivity, forced and compulsory labor, and human trafficking.

DİTAŞ never tolerates modern slavery methods and expects and requests its suppliers to act in the same way as per European Convention on Human Rights. Ditaş A.Ş. observes all statutory legislations and regulations about modern slavery and undertakes to make sure all necessary actions are taken.

6. HEALTH, SAFETY, AND ENVIRONMENT

6.1. Health and Safety

Ditaş believes that a healthy and safe workplace environment is essential for its employees. Within the scope of these processes, in addition to all official laws, policies and principles created for our employees are applied. A step-by-step risk analysis of the whole factory has been carried out and improvements have been made in all areas that pose a risk. All problems and solutions are addressed and considered by holding monthly Occupational Health and Safety board meetings.

6.2. Environment and Responsible Raw Material Management

6.2.1. Environmental Management

DİTAŞ carries out its process management with a management philosophy based on minimizing or eliminating the damage it causes to the environment. In this framework, it supports economical use in all its processes where there is natural resource consumption such as energy and water. DİTAŞ carries out emission measurements and tasks to protect air quality.

DİTAŞ controls and checks all chemical substances it uses with their CAS numbers and acts within the scope of REACH Regulation. It manages its waste in accordance with the Environment Regulation.

6.2.2. Responsible Raw Material and Conflict Minerals

DİTAŞ strives to supply the raw materials used in its operations in a responsible manner. It undertakes to conduct its operations in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and other laws and regulations related to conflict minerals, ensuring that it doesn't use conflict minerals in the raw materials it has procured. DİTAŞ refrains from intentionally purchasing any product, component or material containing minerals that are not confirmed by the DRC to be conflict-free. DİTAŞ does not use raw materials containing minerals such as tin, tantalum, tungsten or gold (3TG) and does not use products with this content in its production processes.

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It also undertakes to refrain from any act contributing to financing of conflict and observe the relevant UN sanction decisions or the local laws applying these decisions in cases where they're applicable, and expects its suppliers and work partners to observe the same issues.

DİTAS undertakes that for substances subject to legal restrictions or prohibitions, delivered materials or parts or components contained in them can only contain those in accordance with the relevant legislation (banned chemicals regulation, (EC) 1907/2006 REACH Regulation etc.).

DİTAS expects its suppliers to comply with the same Responsible Sourcing of Raw Materials policy. DİTAS cooperates with its suppliers to ensure awareness and compliance with the terms of this policy.

7. BUSINESS ETHICS

7.1. Conflict of Interests

The fundamental principles related to conflicts of interests and their management are provided below.

Our employees may never use their duties and powers for their own interest, the interests of their family or 3rd parties in order to derive personal and private benefits.

Our employees may not accept gifts related directly or indirectly to their corporate works, may not obtain benefit, or may not borrow from the persons or companies which the company has a business relationship with.

Our employees may not give gifts to third parties or organizations in such a way to influence their impartiality, decisions, or behaviors, and may not provide benefit to them.

The company's resources and facilities may not be used to support political activities, no political activity may be carried out within the company, no donation may be made to political parties or their candidates, and political campaigns may not be supported.

7.2. Gifts, Hospitality and Invitations

It must be made sure that the gifts that may be given to the parties which the company has a business relationship with are in compliance with the rules specified in this document. The following rules have been determined for the gifts that can be given accordingly.

The main rule in this respect is that no monetary payment of any amount or no gift that may be easily turned into cash must be given. However, the gifts that may be given by our employees, suitably for their status and position, for special or general celebrations (wedding, engagement, birthday, etc.) in accordance with our customs and traditions are excluded.

The value of any gift given may not exceed TRY 500. For exceptional cases, the approval of the top manager of the relevant department is required.

The gift given must not be intended to influence the impartiality, decision, or behavior of the relevant counterparty related to any business, agreement or bureaucratic procedure which our company takes part in.

Our employees may never request, or purport to request, any personal payment or gift from 3rd parties which work with our company. Gifts may be accepted only under the following rules in good faith.

Our employees may never accept any monetary payment of any amount. Instruments that may be easily turned into cash (gift voucher, etc.) are also included in monetary payments.

The gifts, which are not of monetary payment nature, may be accepted provided that their value does not exceed TRY 500, that they are not related to any business and agreement concerning the company, and that it is obvious that they are not given to influence our employees in this regard.

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In case of an offer or provision of a non-cash gift of a value exceeding TRY 500, it is essential that the employee does not accept such offer. However, exceptionally, in case of a gift offer not to cause any conflict of interest and not offered for this purpose, such gifts may be accepted upon the written approval of the management. Written approvals are obtained from the top manager of the relevant department. Approvals obtained to certify that the gift may be accepted must be kept by the party who obtained the approval. For inviting any party to dinner or for accepting any dinner invitation, it must be paid attention that the offer is suitable for its intended purpose. As a principle, an invitation made as a business dinner invitation must be suitable for the business dinner concept and must be in a suitable place for the position of the participants.

7.3. Personal Information

Ditaş A.Ş. requires its suppliers to protect the personal data of their employees, former employees, customers, suppliers and other relevant persons and implements the LPPD Policy. Ditaş processes, uses and stores personal data only with the consent of the data subject, in accordance with a contractual agreement or legal rules.

7.4. Bribery and Corruption

Ditaş A.Ş. supports national and international efforts to protect fair competition from the distorting effects of corruption, and rejects any and all potentially damaging corrupt practices and behaviors. You may not offer or give any valuable gifts, financial or other advantages to anyone in order to act biased or to influence the decision-making process. Bribery occurs where someone authorizes, offers, encourages, gives, receives, or accepts any valuable gift, financial or other advantage in exchange to ensure that a company, government agency, official or employee acts in favor of them. Cash payments, gifts, favors, any valuable items or services, or any other financial advantage are considered as bribes. As Ditaş A.Ş., in order to act in accordance with the bribery laws, you must avoid making or receiving improper direct payments to/from another commercial party, customer, customer's representative, official employee or government official.

7.5. Fair Competition and Anti-Trust

Ditaş A.Ş. requires compliance with applicable fair competition and antitrust laws. In particular, it will not enter into agreements with stakeholders or other third parties that are not in compliance with fair competition and will not abuse its dominant market position. Our employees may never engage in behaviors and agreements that may create a dominant position in the market with competitors or that may affect the pricing and marketing policies, or that may breach the competition regulations. In case of uncertainty, actions are taken by receiving the opinion of the Legal Consultancy Department. Illegal and unlawful arrangements with competitors, customers and suppliers and unfair or monopolistic trade practices are prohibited.

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7.6. Money Laundering

Ditaş A.Ş. conducts business relationships only with business partners whom it is convinced of their honesty and integrity. It complies with applicable legislation on the prevention of money laundering, strongly opposes any activity that may lead to money laundering and does not engage in such activity.

7.7 Counterfeit Parts

Ditaş A.Ş provides all its products and services in accordance with the contractually specified quality and safety criteria and supplies original production parts during delivery. It complies with all laws and regulations regarding being a public company. Processes to detect counterfeit parts and materials are determined, and if such materials are detected, legal sanctions are imposed on the relevant supplier.

7.8 Export Controls and Economic Sanctions / Accounting and Financial Reporting

Ditaş A.Ş strictly complies with legal provisions, uses only proper accounting and correct financial reporting method. It assumes as the duty to inform everyone involved regularly for the purpose of transparency and accuracy.

Appropriate policies and procedures may include the following: compliance with a statement of management's commitment; periodic training for relevant personnel; procedures for screening business partners (including suppliers, customers, service providers, and other relevant funds and their benefits - official owners); appropriate contractual provisions of the parties restricted according to the relevant government lists, such applicable laws and regulations to ensure business partners comply with those; republishing of policies and procedures and potential violations for an audit function and reporting.

7.9. Information Leakage

Any and all information of the company subjects to the confidentiality principle, and it is prohibited to transfer or merchandise this information to 3rd parties. Accordingly;

Any and all information of the company and the personal information of the employees, as well as the information belonging to the company's business partners, is kept confidential.

Employees may not disclose the confidential and non-public information about the company, or may not use the same for their own benefit or for the benefit of others.

Restrictions related to copyrights, trade names, trade secrets, and patents are respected.

The information about the company's customers is kept confidential as per the protection of personal data. Such information is never disclosed to third parties, except for the written orders of official authorities.

8. IMPLEMENTATION

Our employees are expected to be attentive to the principles specified in the Ethical Rules and Code of Conduct. Accordingly;

Actions are taken in accordance with the Labor Law, other respective legislation, and provisions of the policies, regulations, and procedures, against those breaching the rules specified in this document.

Employees may notify any breach of rules to the Department Manager and the General Manager.

Any personnel member who is aware of any violation of a rule but do not inform the Department Manager or the General Manager about this issue are evaluated within the same framework as the personnel member who committed the violation.

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9. PUBLISHING AND STORING THE DOCUMENT

This Policy is kept in two different environments, namely hard copy and electronic environment. The updated version of documents is available on the corporate portal and website. The copies with wet signature are kept in the archive of the Headquarters and the controlled copies are kept by the Human Resources and destroyed by the Financial Affairs Department upon the written approval of the relevant department manager when necessary.

10. PERIOD OF UPDATE

This Policy is reviewed at least once a year and updated when necessary.

11. EFFECTIVE DATE

This Policy enters into force on the date of adoption by the Executive Board.

12. ABOLISHMENT

In case it is decided to abolish this Policy, the former copies with wet signature of this Policy are cancelled (by applying cancellation stamp or by writing "canceled") and signed by the Financial Affairs Department upon the written approval of the relevant department manager, and kept by the Financial Affairs Department for a period of 5 years.

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