



SASA BUSINESS ETHIC RULES POLICY

I. OUR BUSINESS ETHICS RULES

A. Honesty

Integrity and honesty are our primary values in all our business processes and relationships. We act with integrity and honesty in our relations with our employees and all our stakeholders.

B. Privacy

Confidential and proprietary information includes SASA (Company) information that may create a competitive disadvantage, trade secrets, financial and other information that has not yet been disclosed to the public, information on personnel rights and information within the framework of "confidentiality agreements" concluded with third parties.

As SASA employees we take care to protect the privacy and private information of our customers, employees and other relevant persons and organizations we cooperate. We protect confidential information about the Company's activities and use this information only for the Company's purposes; we share this information with the relevant persons only within the specified authorities.

It is absolutely unacceptable for us to gain any commercial interest, including the buying and selling of shares from stock exchanges, by leaking any confidential information about the Company (insider trading). When leaving our company, we do not let out confidential information and documents, projects, regulations and similar works that we have due to our duties.

C. Protection of Personal Data

The employee cannot share transmit, disclose, misuse the personal data and sensitive personal data belonging to employer or employer's representatives, employees, subcontractor employees, customers, suppliers, third parties, guests, job applicants, interns and all natural persons related to company activities at the workplace in written, audio or visual form, or gain personal benefit in this way without the written consent of the data subject and the employer.

D. Conflict of Interest

As SASA employees, we aim to avoid conflicts of interest. We do not derive personal benefits from individuals and organizations with whom we have business relations, personally, through our family or relatives by taking advantage of our current duties and responsibilities. We do not engage in business activities outside the Company based on an additional financial interest. We avoid using SASA's name and power, our SASA identity, for personal benefit.

In the event of a potential conflict of interest, we apply these methods when we believe that the interests of relevant parties can be safely protected through legal and ethical methods. When in doubt, we consult our manager, the Human Resources and Industrial Relations (İKEİ) Management or the Company's Code of Ethics Advisor.



E. Our Responsibilities

In addition to our legal responsibilities; we take care to fulfill our responsibilities listed below towards our customers, employees, shareholders, suppliers and business partners, our competitors, society, humanity and on behalf of SASA.

1. Legal Responsibilities:

We carry out all our current activities and transactions domestically and abroad within the framework of the laws of the Republic of Turkey and international law, we provide accurate, complete and comprehensible information to legal regulatory institutions and organizations in a timely manner.

While carrying out all our activities and transactions, we keep an equal distance to all kinds of public institutions and organizations, administrative formations, non-governmental organizations and political parties without any expectation of benefit, and we fulfill our obligations with this sense of responsibility.

2. Our Responsibilities Towards Our Customers:

We work with a proactive approach focused on customer satisfaction, responding to the needs and demands of our customers in the shortest time and in the most correct way. We deliver our services in a timely manner and under the promised conditions, we approach our customers within the framework of the rules of respect, honor, justice, equality and courtesy.

3. Our Responsibilities Towards Employees:

We ensure that employees' personal rights are fully and correctly used. We approach our employees honestly and fairly, and commit to a non-discriminatory, safe and healthy working environment. We make the necessary effort for the personal development of our employees, we support our employees to volunteer for appropriate social activities in which they will take part with a sense of social responsibility, we observe the balance between the business life and private life of our employees.

4. Our Responsibilities Towards Our Shareholders:

We avoid taking unnecessary or unmanageable risks and aim for sustainable profitability by giving priority to the sustainability of SASA and in line with the aim of creating value for our shareholders. We act within the framework of financial discipline and accountability, and we manage our company's resources and assets, as well as our working time, with an awareness of efficiency and savings. We take care to increase our competitiveness and invest in areas with growth potential and which will provide the highest return on the resource obtained. We provide timely, accurate, complete and comprehensible information about our financial statements, strategies, investments and risk profile in our public statements and to our shareholders.

5. Our Responsibilities Towards Our Suppliers/Business Partners:

We act fairly and respectfully, as expected from a good customer, and show due diligence to fulfill our obligations in a timely manner. We pay attention to protect the confidential information of the people and organizations we do business with and our business partners.



6. Our Responsibilities Towards Our Competitors:

We compete effectively only in areas that are legal and ethical, and we avoid unfair competition. We support efforts to ensure the targeted competitive structure within the society.

7. Our Responsibilities Towards Society and Humanity:

Protection of democracy, human rights and the environment; education and charity work, the elimination of crime and corruption are very important to us. We act sensitively as a pioneer in social issues with the awareness of being a good citizen, we try to take a role in non-governmental organizations, public interest services, and appropriate activities on these issues. We are sensitive to the traditions and cultures of Turkey and the countries where we carry out international projects. We do not give or accept bribes or gifts and similar products and services at an exorbitant price.

8. Our Responsibilities Towards the Name of “SASA”

Our business partners, customers and other stakeholders trust us because of our professional competence and integrity. We try to keep this reputation at the highest level.

We offer our services within the framework of corporate policies, professional standards, commitments and ethical rules, and we show the necessary dedication to fulfill our obligations.

We pay attention to serve in areas we believe we are and will be professionally competent, and we aim to work with customers, business partners and employees who meet the criteria of accuracy and legitimacy. We do not work with those who harm the morality of the society, harm the environment and public health.

We express only our Company's views, not ours, in public and in areas where the audience thinks we are speaking on behalf of our corporation.

When faced with complex situations that may put the company at risk, we first consult with the relevant employee, following appropriate technical and administrative consultation procedures.

II. POLICIES SUPPORTING BUSINESS ETHICS

A. Conflict of Interest Policy

It is essential that company employees stay away from situations that may create a conflict of interest. It is among the most important responsibilities of all employees that the company's resources, name, identity and power are not used for personal benefit, and to avoid situations that may adversely affect the name and image of the organization. The following principles of practice determine the situations of conflict of interest that Company employees may encounter in their private lives while performing their duties or due to their business relationships, and the principles to be applied in such cases.



Code of Practice

1. Activities That May Create Conflict of Interest

Company employees are required to fully comply with the situations listed below as activities that may create a conflict of interest and the principles specified. The company perform the necessary studies to encourage its employees to comply with these principles.

i. Engaging in Activities That May Create a Conflict of Interest

Within the scope of their duties, employees do not enter into a business relationship that provides mutual or unrequited benefits with their family members, friends or other third parties involved. For instance, an employee authorized to purchase should refrain from doing business with a supplier where one of their family members works. Exceptional cases are subject to the knowledge and approval of the Company's Board of Directors. Likewise, company employees should also be wary of conflicts of interest that may arise due to the work of close family members in the Company's competitors.

By leaking any information belonging to the Company from the inside, employees cannot obtain any commercial interest, including the trading of shares on the stock exchange, and cannot cause others to gain benefits.

It is essential that the employees of the Company do not engage in activities that require them to be considered "merchants" or "tradesmen" directly and indirectly, and do not work for a wage or similar benefit for another person and/or institution during or outside of working hours under any name. However, it is possible for employees work outside of working hours for another person (family member, friend, other third party) and/or institution for wages or similar benefits, provided that the following conditions;

- Not to create a conflict of interest with the duty they maintain in the Company,
- Not to create incompatibility with other business ethics rules and policies that support these rules,
- Not adversely affecting their continued duties at the Company,
- Written approval of management.

Approval is given by the Company's Executive Board for the Assistant General Managers, and for other employees, by the Company's Ethics Code Advisor, in the opinion of İKEİ Management, by the Deputy General Managers of the Company.

Employees cannot be a member or auditor in other companies without the approval of the Company's Board of Directors; cannot take office in competitor or companies with which the Company has business relations. In non-profit organizations and universities, they can work in social responsibility and assistance duties with the written approval of the Management in cases where they do not disrupt their duties within the Company.

Managers who are in a position to make hiring decisions cannot hire their spouses, close relatives and relatives of these people.



Employees can make speeches and write professional articles about issues that are not related to the company and its activities and do not contradict its policies. In order to use the Company name in these activities, approval must be obtained from the Assistant General Manager.

Employees can actively operate in any political party, individually and voluntarily. Managers cannot ask their employees to do a political job or become a member of a party. It is possible for employees to take part in any political party with the following conditions and written approval of the management;

- The involvement of employees in any political activity should not create a conflict of interest with the role they hold in the company.
- Employees may not engage in any political activities during working hours and may not take the time of their colleagues related to these activities.
- Employees cannot use the company name, position in the company, title, and resources of the company during their political activities.

Employees may personally provide material or moral assistance and/or donations to third parties outside the Company and may take part in charities provided that they do not use the name and facilities of SASA.

ii. Misconduct

It is unacceptable for employees to harm the Company by using their authority against their own and/or their relatives' interests and outside of the care expected of them.

Employees cannot directly or indirectly gain personal profit from the Company's purchasing and sales activities, as well as from all transactions and contracts to which it is a party.

Employees cannot engage in acts or behaviors contrary to morality, law and company discipline.

iii. Use of Resources

In the use of resources on behalf of the Company, the interests of the Company are taken into account. Company assets, facilities, and employees, regardless of the company's interest, under any name and on behalf of and for whom, may not be used outside the Company. The principle of "saving on everything" is applied by all employees.

Proper use of resources in the interest of the Company also requires the correct use of time. During business hours, employees make good use of time, do not make time for their private work during business hours. Managers cannot assign employees for their personal work.

During working hours, it is essential that no special visitors are allowed. Employees are required to complete interviews for mandatory visitors in a reasonable time in connection with the subject of the visit and in a way that does not interfere with the workflow.



iv. Relationships with Other Persons and/or Organizations with which the Company Has a Commercial Relationship

Private business relationship cannot be entered into with company customers, subcontractors or suppliers and other persons and/or organizations with which the Company has a commercial relationship, personal debt money and/or goods/services cannot be obtained and borrowed money and/or goods/services cannot be provided to other persons and/or organizations with which the Company has a commercial relationship.

The following considerations are taken into account in relations with customer; even in favor of the customer, no action can be taken without customer information and even if it is in favor of the company, customer weaknesses cannot be exploited and profit motives by providing incomplete or incorrect information to the customer.

Employees cannot request or imply any gifts from other persons and/or organizations with which the Company has a business relationship; It cannot accept any gifts, money, checks, properties, free holidays, special discounts, etc. that will put the Company under obligation. Personal aid and donations from any person or organization with business relations with the Company are not acceptable. The Gift Acceptance Policy applies in relation to the subject matter.

v. Media Relations

In relations with the media, the Company acts within the Company Communication Policy.

It is up to the approval of the Deputy General Managers to make statements to any broadcaster, to conduct interviews, to attend seminars and conferences, etc. as speakers. Personal gain cannot be obtained from these activities.

vi. Representing the Company

In all kinds of associations, employers' unions and similar non-governmental organizations representing the Company, any fees accrued in accordance with the duty performed are donated to the relevant institution or to the channels to be shown by the relevant institution.

Payments made by third parties to the Company employee for seminar speaker fees or a similar service are similarly donated to the relevant institution or channels to be directed by the institution. Apart from money, they can receive gifts such as awards, plaques, etc., which are given as the memory of the day and have symbolic value.

Control, follow-up, revision, development, implementation and execution of the policy are under the direct responsibility of the Human Resources and Industrial Relations Management.

B. Gift Acceptance Policy

It is essential that employees do not accept gifts or benefits that may affect their impartiality, decisions, and behaviors, and do not attempt to provide gifts and benefits to third persons and organizations that may have such effects. The application principles defined below regulate the gift exchange with the 3rd persons and organizations with which the employees have a business relationship and determine the principles to be applied in this regard.



Application Principles

1. Employees are prohibited from receiving any benefits and gifts that may or may not affect their impartiality, performance, decision-making, economic value or non-existent while serving.

2. Employees may receive and/or give gifts framed in Article 3 under the following conditions;

- Compatible with corporate business objectives,
- Comply with applicable legislation and
- Public learning of the gift will not put the Company in a difficult position

or the Employees may agree to be subject to special application.

3. Provided that it complies with the conditions specified in article 2;

- Employees can provide and receive entertainment, treats and meals to acceptable standards in the business world, provided that they comply with the principles in the Relevant Documents regulating the authority of the Company.
- In seminars and similar organizations attended on representing the Company, gifts such as awards, plaques, etc. with symbolic value can be received as a memory of the day other than money.

4. Except for the aforementioned circumstances and other gifts other than money, interests, holidays, discounts, etc. the total value of the gifts received separately from each calendar year and the person/institution that gave the gift, provided that it complies with the conditions listed in Article 2, is not required for approval if it is less than 250 Turkish Liras.

5. It is forbidden to receive gifts or benefits that are implicitly or expressly linked to a reward.

6. Taking, giving, or offering bribes and/or commissions is not acceptable under any circumstances.

7. Employees are prohibited from accepting gratuitous or borrowed money from sub-employers, suppliers, consultants, competitors, or customers, and to cover travel expenses, event expenses and similar payments.

8. The gifts and promotional materials to be given by the Company to the customer, dealer and other persons with whom the business relationship is made are determined with the approval of the Deputy General Manager. For the distribution of approved gifts and promotional materials, there is no need to obtain additional permission.

9. Provided that it complies with the conditions listed in Article 2, the Company may accept the appropriate products and services as gifts and, with the knowledge and approval of the Deputy General Managers, products, or services in accordance with the buyer's culture and ethical values may be given as gifts.



10. In exceptional cases where local cultural values require mutual gifting above those set out in the Company's policy, these gifts may only be accepted on behalf of the Company and with the approval of the Deputy General Manager . In any case, gift exchange should be done in accordance with the local culture.

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C. Confidential Information Protection Policy

Information is one of the most important assets that the Company will use to realize its vision. Accordingly, it is the common responsibility of all our companies and employees to ensure the effective use, accurate sharing and confidentiality, integrity, and accessibility of information in this process. It is important for the Company to achieve the highest level of benefit by harmonization of the management systems established and the processes implemented for the management and confidentiality of information in our company. Details of the relevant applications are included in the SASA Information Security Policy and related documents. The following application principles are: It identifies confidential information for the company and regulates the principles that employees must follow regarding confidential information.

Application Principles

Confidential Information, including but not limited to the Company's trademark, etc. intellectual property, database, printed communication materials, processes, advertising, product packaging and labels and plans (marketing, product, technical), business strategies, strategic partnerships and partners, including all kinds of innovations, written, found, developed, made or implemented by employees related information, financial information, personnel information, customer lists, product designs, know-how, specifications, identity of potential and real customers, information about suppliers, etc. includes any written, graphic or machine-readable information.

The principles to be followed regarding confidential information are listed below:

1. This information cannot be disclosed to third parties unless disclosure is required by the Official Authorities and legislation.
2. This information cannot be altered, copied, or destroyed. Necessary measures are taken to keep the information careful, stored and not exposed. Changes to the information are recorded with its history.
3. Confidential files cannot be taken out of the institution. For confidential information that needs to be taken out of the institution, the approval of the person responsible or the senior management should be obtained.
4. Passwords, user codes and similar identifying information used to access company information are kept confidential and are not disclosed to anyone other than authorized users.
5. Company confidential information is not discussed in public places such as dining halls, cafeteria, elevator, service carts and similar public places.
6. Confidential information is classified according to the degree of confidentiality, clearly stated in the content of this information. Employees know the degree of confidentiality of



the information obtained by their duty and act in accordance with this confidentiality. When there is a hesitation in terms of the degree of privacy, it is treated according to a higher privacy class and, when necessary, the opinion of the relevant manager is taken.

7. In the event of sharing information with third parties and/or organizations in the interest of the Company, a confidentiality agreement is signed or a written confidentiality commitment is taken from the other party to share information in order to ensure that the responsibilities of these individuals and organizations regarding the security and protection of shared information are understood.
8. False statements and/or rumors about individuals or institutions cannot be made.
9. Personal information about the wages, benefits and similar personal information of the personnel that reflects the company's policy and is personally specific is confidential and cannot be disclosed to anyone other than the authorities. Employee information is sent individually. It is strictly forbidden for employees to disclose this information to others or to pressure other employees to disclose the information.

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D. Policy on Establishing and Maintaining a Fair Working Environment

The Company considers the creation and maintenance of a fair working environment for employees as one of its top priorities. It is aimed to increase the success, development and loyalty of employees by creating a fair, employee-respecting, healthy and safe working environment that is compatible with all relevant laws and regulations. The following application principles define the basic principles for the creation and maintenance of a fair working environment in the Company.

Application Principles

1. Company practices comply with all applicable laws and regulations regarding employment and working life. Company employees also fulfill all legal requirements within the scope of their activities and act in accordance with legal regulations.
2. SASA Human Resources and Industrial Relations Management policies and practices; it ensures that all other practices such as recruitment, promotion-transfer-rotation, remuneration, rewarding, social benefits, etc. are fair.
3. Discrimination among employees for language, race, color, gender, political thought, faith, religion, sect, age, physical disability, and similar reasons is unacceptable.
4. In the Company, a positive and harmonious working environment is created to support cooperation and conflict environments are prevented and people with different beliefs, opinions and opinions are ensured to work harmoniously.
5. Employees' privacy and personal space are respected.
 - Communications between individuals cannot be violated by non-party persons.
 - Even if it is recorded in accordance with the law, the unlawful transfer/ dissemination / seizure of personal data to others is prohibited.



- Personal information of personnel arising from the nature of the business relationship in the workplace and may be required in the future is not used for any purposes other than for their purposes and cannot be shared with third parties without the consent of the persons.
 - All employees' private and family life is respected.
6. In addition to all kinds of immunity of employees, their physical, sexual and emotional immunity is also taken into account.
- Any violation of the immunity of employees in any way through physical, sexual and/or emotional harassment in the workplace or anywhere they are for work reasons is against the law and Business Ethic Rules Policy and this crime is not tolerated by the Company in any way. The aim of this application is to ensure that employees work in a work environment where their physical, sexual and emotional immunity is protected.
 - Violating a person's body immunity through sexual behavior and/or sexually assaulting a person without physical contact is defined as sexual harassment. According to this, it is forbidden to exhibit any behavior that may be evaluated within this definition.
 - In addition, those who complain and report any harassment or engage in negative behaviors and behaviors towards persons who assist during the investigation are not tolerated in the same way.
7. No employee can request privileged practice, show any privileges to anyone, or be subjected to a special practice due to different genders, religions, languages, races,. It is unacceptable to make concessions using differences such as gender, religion, language, race.
8. The workplace physical working environment and conditions are ensured to be healthy and safe for all employees.

Control, follow-up, revision, development, implementation and execution of the policy are under the direct responsibility of the Human Resources and Industrial Relations Management.

E. Company Stock Trading Policy

It is essential that employees comply with the Company's legal regulations regarding the purchase and sale of stocks and avoid situations that may create a conflict of interest. The following application principles determine the principles that employees should apply when it comes to buying and selling the Company's stock.

Application Principles

1. Those who are in a position to know non-public information are prohibited from using this information to benefit themselves and/or third parties (insider trading).
2. The persons who may trade insiders are members of the Board of Directors of the publicly traded Company, managers (managers and higher officials), auditors, those who may otherwise be able to have information during their professional and duties, and those who may be directly or indirectly informed due to their contacts.



3. These individuals can only buy and sell the Company's shares using publicly disclosed information and for investment purposes (possession for more than 3 months is considered for investment purposes).

4. Company employees other than these individuals may freely buy and sell Company stocks without time restrictions using publicly disclosed information.

5. The above-mentioned applications also apply to the spouses and children of the employees and the actions of the spouses and children are considered to have been done by the employee.

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F. Anti-Bribery and Anti-Corruption Policy

For SASA;

Corruption refers to the abuse of power, directly or indirectly, for any kind of benefit. Bribery refers to the provision, offer or promise of a benefit, directly or through intermediaries, with the aim of performing, making do, not doing, speeding up or slowing down a job related to the performance of one's duty; request or accept; to provide an advantage to himself or the party requesting it, or to someone else due to this relationship, within the framework of an agreement reached with another person in order to act contrary to the requirements of his duty by means of intermediary means.

Bribery and corruption can take place in many different ways, including:

- Cash payments,
- Political or other donations,
- Commission,
- Social rights,
- Gift, hospitality,
- Other benefits.

Facilitation payments are informal, improper, small amounts of payments made to a low-grade official to secure or expedite the execution of a routine or necessary action to which the facilitating payer is legally entitled. Such irregular payments are tracked through notifications made to Ethics Committee.

Offering facilitation payments is prohibited to secure or speed up a routine transaction or process (obtaining permits and licenses, obtaining documents, etc.) with government agencies of individuals and organizations within the scope of this Policy.

Within the framework of transparency and accountability, we take all necessary measures to prevent all forms of bribery and corruption. If any SASA employee or stakeholder witnesses any actions or practices related to bribery and corruption, reports this situation to the Human



Resources and Industrial Relations Management, or if the relevant situation was determined by Human Resources and Industrial Relations Management and authorized units;;

- A. The Disciplinary Committee for SASA employees convenes and if it is determined that the employee has attempted or carried out an action related to bribery and corruption, the necessary sanction is immediately applied, taking into account the principle of moderation after the written defense has been received or the deadline for him to give a written defense has passed. Sanctions such as warnings, reprimands, wage cuts can be applied or termination can be terminated in accordance with the principle that termination is a last resort.
- B. SASA stakeholders, customers, suppliers and/or SASA's commercial and industrial ties may have any connection to bribery and/or corruption, and if any attempts or acts are detected, necessary notifications are made immediately by contacting the legal authorities.

Control, follow-up, revision, development, implementation and execution of the policy are under the direct responsibility of the Human Resources and Industrial Relations Management.

G. Political Participation Policy

SASA adopts the idea that it is important and necessary for individuals to participate in political life in order to develop democracy and raise awareness of societies in this regard. SASA respects the diversity of political views.

In accordance with the company policy, in order to provide a democratic, fair, safe and sustainable working environment, the framework of political participation activities of the employees, suppliers and other stakeholders has been drawn with the following principles of practice:

Principles of Practice:

- 1- In accordance with the company policy, political activities cannot be carried out under any circumstances and under any name. No financial aid, donations, or recognition, support or implementation of a political action can be accepted on behalf of SASA to any political party or candidate.
- 2- SASA employees, suppliers and other stakeholders are independent at the point of deciding on political activities and voluntary participation, provided that they do not use the name and facilities of SASA. For SASA employees, this independence covers the time outside of working hours.
- 3- SASA employees who communicate with their political stakeholders in public life;
 - 3.1. Know that the information they convey to the parties is correct and up-to-date and should not contain misleading statements.
 - 3.2. Do not influence a decision by coercion or misbehavior
 - 3.3. The employee representing on behalf of SASA does not exceed the company's equal distance policy in political discussions



3.4. Do not share information, documents and similar records obtained from institutions and organizations with third parties, do not derive any material benefit

4- As with all of its stakeholders, SASA is open to dialogue with its political stakeholders within the framework of ethical principles. However, this dialogue does not bring relations with any political party, assembly member, person or institution.

5- SASA does not engage in any lobbying activities with political stakeholders.

Control, follow-up, revision, development, implementation and execution of the policy are under the direct responsibility of the Human Resources and Industrial Relations Management.

III. LEGISLATION TO BE IMPLEMENTED

Due to the fact that the Company operates in international markets, Company operations may be subject to different country laws and regulations. When there are questions regarding the ethics of doing business in different countries, the established regulations should be followed in the country where the work is carried out. If following the regulations in the countries and/or countries where the work will be carried out is capable of creating inconvenient consequences for the ethical values adopted by the Company, then we should try to find solutions within the SASA-Business Ethic Rules Policy and procedures we have.

IV. RESPONSIBILITIES OF EMPLOYEES

SASA-Business Ethic Rules Policy and procedures have detailed the ethical rules on how we should behave and do our job. Compliance with these rules is the primary responsibility of all employees. Accordingly, the employees of the Company have responsibility of;

- Acting in accordance with laws and regulations under any circumstances,
- Reading the SASA-Business Ethic Rules, knowing, understanding, internalizing and acting accordingly to the rules, principles and values contained in it,
- Learning the specific policies and procedures applicable to the Company in general and related to its business,
- Consulting with the relevant manager and İKEİ Management about potential violations related to him or others,
- Reporting possible violations of himself or others immediately; communicate notifications with these matters in writing or verbally to their manager, İKEİ Management and/or the Company Code of Ethics Advisor,
- Following the "Paths and Methods to be Followed while Making Ethical Decisions" defined to help in acting in accordance with the rules and solving problems,
- Cooperating with the Company's Ethics Advisor in ethical investigations, keeping information related to the investigation confidential.



A. Ways and Methods to be Followed while Making Ethical Decisions

As a guide to deciding on an action plan, you need to follow these steps and ask yourself these questions:

1. Identifying the Event, Decision, or Problem

- Have you been asked to do something that you think may be wrong?
- Are you aware of a situation in your company or business partners that may potentially be illegal or does not conform to the ethics of doing business?
- Are you trying to make a decision and have doubts about how you should behave in accordance with the ethics of doing business?

2. Think Before You Decide

- Try to clearly identify and summarize the problem or your question
- Ask yourself why there is a dilemma
- Consider options and consequences
- Think about who might be affected
- Consult others

3. Decide on a Plan of Action

- Determine your responsibilities
- Review all relevant facts and information
- Consult appropriate company policies, procedures and professional standards
- Assess the risks and think about how you can reduce them
- Try to create the best action plan
- Consult others

4. Test Your Decision

- Review ethical questions
- Review your decisions within the framework of the company's core values
- Be sure to consider company policies, laws and professional standards.
- Consult with others and consider their opinions within the plan of action you plan.

5. Proceed with Determination

- Share your decision with the relevant people with your reasons
- Share what you've learned
- Share your success story with others

B. 4 Essential Questions to Consider

1. Is this activity/behavior in compliance with the law, rules and traditions? (Standards)

- Does it comply with professional standards?
- Is it in compliance with the law?



2. Is this activity/behavior balanced and fair? Would we be offended if the competitor firm (someone else) did it? (Sense of justice)

- Is it right for you?

3. Would it be uncomfortable if our company and our stakeholders heard all the details of this event in public? (Emotions and ethical values)

- Would you be in a difficult situation or embarrassed if others knew that you were engaging in this behavior?
- Can it have negative consequences for you or for your Company?
- Who else may be affected (other employees within the Company, you, shareholders, etc.)?

4. To what extent does "perceived truth" correspond to "objective truth"?

- How would it be reflected in newspapers, on social media?
- What would a reasonable person think under the same circumstances?

V. RESPONSIBILITIES OF MANAGERS

Company managers have additional responsibilities within the framework of SASA- Business Ethic Rules Policy beyond the responsibilities defined for employees. Accordingly, managers have responsibility;

- To ensure the creation and maintenance of a company culture and working environment that supports SASA- Business Ethic Rules Policy,
- To be an example for the implementation of SASA- Business Ethic Rules Policy with their behavior, to educate their employees about ethical rules,
 - To support its employees to submit questions, complaints and notifications about SASA- Business Ethic Rules Policy,
 - To guide employees on what to do when consulted, to take into account all the notifications conveyed and, when necessary, to communicate them to the Ethics Advisor as soon as possible,
- To ensure that the business processes under its responsibility are structured to minimize the risks associated with ethical issues and to implement the necessary methods and approaches to ensure compliance with SASA- Business Ethic Rules Policy.
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VI. RESPONSIBILITIES OF SASA CODE OF ETHICS ADVISOR

Code of Ethics Advisor has responsibility;

- To provide direction and consultancy on questions and issues conveyed by the employees about ethics within the company,



- To conduct the proper investigation of nonconformity that requires an investigation, and to establish an Ethics Committee, if necessary,
- To report ethical questions and nonconformities together with the consequences to the Deputy General Managers on a regular basis or when requested.
- To pursue and review the effectiveness of SASA- Business Ethic Rules Policy practices carried out in the Company and to support in applications.

VII. OTHER RESPONSIBILITIES

- Company Senior Management; They are responsible for the effective implementation of the SASA- Business Ethic Rules Policy and the creation of a culture in which it is supported.
- SASA- Business Ethic Rules Policy and any relevant policies are reviewed, revised and documented by IKEI Management and announced to the Companies with the approval of the Deputy General Managers.
- IKEI Management has responsibility;
 - To inform employees about ethical rules, to provide trainings in certain periods in order to ensure the understanding of policies and rules, and ensuring continuous communication of this subject with employees,
 - To ensure that those who are employed in the Company read the SASA- Business Ethic Rules Policy, to being informed about this and to enable them to sign the Employee Declaration,
 - To ensure that all white-collar employees print out and sign the Business Ethics Eligibility Form available electronically and renew their notifications, at the beginning of each year.
- Company Managements in cooperation with the Ethics Advisor has responsibility;
 - To guarantee the confidentiality of complaints and notifications made within the framework of SASA- Business Ethic Rules Policy and protect individuals after their notifications,
 - To ensure the occupational safety of the employees who provide the notification,
 - To guarantee a timely, fair, consistent and responsive investigation of complaints and notices and take necessary actions as a result of violations.

VIII. ANALYSIS OF NON-COMPLIANCE WITH THE CODE OF ETHICS

Violators of the Code of Business Ethics or Company policies and procedures will be subject to a variety of disciplinary actions, up to and including, if necessary, dismissal. Disciplinary sanctions will also be applied to those who approve or support the inappropriate behavior and actions that cause breaking the rules, or who have knowledge of these issues and do not make the necessary notification properly.



A. Ethics Committee

Ethical Code Advisor of the Company convenes the Ethics Committee consisting of himself, IKEI Manager and Audit Manager in case of an ethical violation that requires investigation. The Code of Ethics Advisor chairs the Board. The Board convenes with the Chairman and at least one of the members. The Board takes its decisions unanimously.

If one of the members of the Ethics Committee is involved in any ethical rule investigation, the said member cannot attend the meetings related to this investigation.

The Ethics Committee works dependently to the Board of Directors. However, when it is necessary, it reports to the SASA's Board of Directors.

The Ethics Committee is responsible for investigating and resolving complaints and notifications regarding violations of ethical rules within the scope of SASA- Business Ethic Rules Policy.

B. Working Principles of the Ethics Committee

The Ethics Committee carries out its work within the framework of the following principles:

- Identity of the people who make notifications or complaints is kept confidential,
- Investigation is conducted as confidentially as possible,
- It has the authority to request information, documents and evidence related to the investigation directly from the corresponding department. It can examine all kinds of obtained information and documents only limited to the subject of investigation.
- The investigation process is written down as a 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 in an immediate method and the result is reached as rapidly as possible.
- Board decisions are put into effect immediately.
- Relevant departments and authorities are informed about the result.
- The Chairman and members of the Board act independently and unaffected from the department managers and the hierarchy within the organization while performing their duties on this issue. They cannot be pressured or indoctrinated on the subject.
- The Board may seek expert opinion if it is necessary, and may benefit from experts by taking measures that will not violate the principles of confidentiality during the investigation.



For your questions and notifications, you can use the e-mail and postal addresses below, or you can contact the Code of Ethics Advisor directly.	
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<i>(Working hours: 08:00-12:30 and 13:30-18:00 on weekdays)</i>	

The Board of Directors undertakes to fulfill the requirements specified in this policy and expects SASA employees to fulfill the same commitments.