

Code of Conduct Sun Group of companies

Ames Europe is part of the Sun Group of companies

This is a resume of the guideline that has been prepared together with the employees of the Sun Group of Companies to describe our Code of Conduct, to guide us at all times, and to be a reference for our business manner and relationships. We will update this guideline, which covers much information that we may need when working and making a decision, together when required, it will always be our guide for all of us.

Who is intended by our Code of Conduct?

For all of us employed within the Sun Group of Companies. Each issue addressed in this guideline applies to all employees, directors, representatives, etc. Moreover, all our directors exhibit the proper behaviors to ensure that their teams act in accordance with our Code of Conduct and that these principles are implemented by their teams.

Everyone who works on behalf of the company (including suppliers and other business partners) shall act honestly, following the principles in our Code of Conduct when providing goods and services to the company or acting on our behalf. We expect our suppliers to comply with the Code of Conduct for Business Partners which is a condition for doing business with us.

How do we follow our Code of Conduct?

We think before we act.

We act prudently, honestly, and ethically in each action we take. We do not break the rules.

We act carefully.

We avoid all activities that violate our policies, laws, and rules.

We follow the laws.

We understand the laws that apply to our business. In case there is an issue we do not understand related to a particular law or regulation, we definitely contact our director, Human Resources department or ethics committee whenever necessary.

We request assistance.

We avoid all activities that violate our policies, laws, and rules.

We report the concerns.

In case of a violation, we shall not ignore it. We prevent damage to our company and our own reputation by promptly reporting our concerns.

HUMAN RIGHTS

As the Sun Group of Companies, we continue to work in a manner that respects human rights, as stated in the UN Universal Declaration of Human Rights (1) and in the fundamental conventions of the International Labor Organization (ILO) (2).

We offer equal opportunities at all stages such as hiring, working conditions, remuneration, performance management, promotion, continuous learning, and retirement.

In the Sun Group of Companies, we do not allow discrimination based on race, gender, skin color, religion, marital status, sexual orientation, political view or affiliation, ethnic identity, health status, family responsibilities, union activity or membership, disability, or age.

We promote the freedom of unionization and collective bargaining of our employees, we do not act contrary to the Human Rights Principles, we do not employ forced or compulsory labor. We support diversity, inclusion, and participation, we stand against harassment and discrimination, we preserve the health, safety, and dignity of employees, we are determined to treat everyone fairly.

- (1) *The United Nations Universal Declaration of Human Rights, which is the most fundamental document in the international arena on human rights, emphasizes that we all have natural human rights, regardless of race, skin color, religion, gender, language, political or other opinions, national or social origin, property, birth or other statuses. It aims to ensure that we reach all our rights, particularly our right to life, in a manner worthy of human dignity.*
- (2) *The International Labor Organization (ILO), which acts in line with its founding mission that peace in working life is indispensable for well-being, strives to realize social justice and internationally recognized human and labor rights. Today, the ILO helps create decent jobs and provides economic and working conditions that will lead employees and businesses to adopt lasting peace, prosperity, and progress.*

Protection of Human Dignity

We strive to respect human life and fundamental freedoms in accordance with international human rights law.

We preserve both self-respect and respect for ourselves by others. We are aware that ethical issues should be examined within the framework of human dignity and human rights. We stand against discrimination by individuals or groups that violate human dignity.

Sexual Harassment

Sexual Harassment is a type of harassment that includes unwanted or unwelcome sexual behavior or actions. Harassment can be physical, psychological, verbal, or nonverbal. Behaviors such as unwelcome dating requests, unwelcome touches, obscene comments, showing pornographic material, or posting such materials also constitute sexual harassment.

We do not accept any form of sexual or other behaviors by means of gestures, words, or any kind towards persons of the same or opposite sex.

We do not accept the insult, exclusion, contempt, and humiliation of the person because of their sexual orientation and identity. We do not consider it ethical to insult, ridicule persons, and use expressions such as "you can't do it, you are a woman", "what kind of man are you", "don't get involved in men's business", "these things are not for women", and "you are a man, right" just because of their gender.

There are a variety of people in terms of their gender, gender identity, gender expression, and sexual orientation. These do not make a person superior or have more rights, nor can they cause the deprivation of rights.

Mobbing

Mobbing includes intimidating behaviors towards a person by one or more individuals in a systematic way in the workplace. Constant scolding, threatening, insulting, and mocking a person, and unfairly vilifying their job performance, not including them in the application areas related to the profession, performing exaggerated checks on their tasks, assigning more works than others, not informing them about meetings and social activities, excluding them, not including, or ignoring them are among the behaviors that can be considered mobbing.

We do not tolerate systematic and planned behaviors that aim to alienate people from work, reduce their performance, or cause them to resign.

Abuse and Violence

We do not allow any behavior that may cause humiliation or embarrassment, verbal abuse, calling names, to any employee in our company, gossip that may disturb the peace and harmony of the workplace, and we expect all our employees to comply with these rules. We scrupulously investigate all forms of abuse, verbal, physical, or visual behavior that creates an offensive, hostile and humiliating environment, and we do not tolerate any form of it.

Physical force is defined as the type of violence that can result in physical, psychological, or sexual harm against another person or a group of persons as a result of its use.

Physical violence and any form of intimidation or frightening are strictly prohibited. The provisions set forth in these terms and conditions are certainly the minimum requirements, not the maximum, and we never use them to prevent companies from exceeding these standards.

Forced and Compulsory Labor

All work and services in which any person is compelled under the threat of pressure, violence, punishment, and against his or her own will refers to forced and compulsory labor.

These behaviors include penal labor, debt bondage, and slavery. The fact that we pay our employees their wages or other compensation does not mean that the work can be done by force or compulsorily.

Our company provides a decent working environment for all its employees. We never accept any "forced labor" actions that may be requested by any of our employees, directors, customers, suppliers, and any person who is not an employee of our company.

Employing Migrant Workers

We support immigrants' access to equal jobs on equal terms in line with the principle of equality and inclusiveness. We mutually sign the employment contract with our foreign employees (This contract is

translated into the immigrant's own language). Foreign/immigrant workers have the right to benefit from all opportunities having the same contract terms as local workers when they are employed.

Freedom of Speech

As Sun Group of Companies, we encourage our employees to express their ideas and opinions, to voice their concerns and complaints, and to ask questions in line with our "open door" policy, provided that they remain within legal and ethical limits.

We are attentive to ensure that internal communication is openly performed between all employees, we do not observe hierarchy in communication, we consider it essential that all titles should communicate openly and directly with each other.

In addition to the planned one-to-one meetings with our director, we can openly express our opinions and suggestions without waiting for any official meeting, we can ask anything, and we can access our director or Human Resources department on any issue.

If we cannot share particular issues with our own director, we can share it with the Human Resources department. If neither of these channels is suitable or if we think that we have tried and failed, we can apply to the Ethics Committee of our company (see Ethics Committee section)

Responsibilities of the Managers of Sun Group of Companies

- To create and maintain a corporate culture that supports our Code of Conduct,
- To set an example for the implementation of our Code of Conduct,
- Informing and training the team on the Code of Conduct,
- Supporting the team in conveying their questions, complaints, and notifications regarding the Code of Conduct, creating an environment where employees can easily express their suggestions and concerns,
- To respond to any violations of our Values, Code of Conduct, and the law without delay and to report them to the immediate manager, the Human Resources department, and/or Ethics Committee in accordance with the hierarchical order.

Conflict of Interests

We accept that there is a conflict of interest in cases that affect or seem to affect our impartial and objective performance of our duties due to all kinds of benefits provided to ourselves, our friends, or the persons or organizations we are in contact with, and having financial or other obligations and similar personal interests related to them.

As employees of the Sun Group of Companies, we avoid activities and relationships that will result in a conflict of interest, we take care to protect the benefit of the company in all our duties, we avoid all kinds of activities and behaviors that may mean gaining benefits for oneself or his/her relatives. As soon as we become aware of the conflict of interest, we report the issue to our superiors, and we refrain from the interests that fall within the scope of the conflict of interest. We evaluate possible cases that may be contrary to the interests of our customers for each service and activity that we are authorized, and we take measures to prevent conflicts of interest.

Wrongful Conduct

We do not take advantage of our job, title, and powers for ourselves, our relatives, or third parties, and we do not act as an intermediary. We do not engage in favoritism or discrimination for any reason. We do not get aid, donations, or similar benefits from any institution, foundation, association, or sports club.

We do not allow the use of official or confidential information, which we obtain while performing our tasks or as a result of these tasks, to obtain economic, political, or social benefits directly or indirectly for ourselves, our relatives, or third parties.

If there are family members, close relatives, and close friends employed in the group, we do not allow these relations to affect the decisions to be taken within the company. Our purchasing officials who are authorized to make purchasing decisions, cannot make a purchase decision for the offers made by companies in which their family members, close relatives, and friends are directly or indirectly partners.

As employees of the Sun Group of Companies, we cannot establish a debtor and creditor relationship with customers and suppliers, and we do not establish a debtor and creditor relationship with colleagues in a way that will damage the company's reputation and relations. We have no tolerance for irregularities, corruption, and bribery that you become aware of in the records of the company.

Not Working in a Second Job

In principle, employees of the Sun Group of Companies cannot be employed to a second job outside the group. However, we always support activities that provide social benefits such as membership in foundations, associations, unions, sports clubs, cooperatives, non-governmental organizations, and professional chambers provided that they do not cause neglecting our duties. Provided that permission is obtained from the Chairman of the Board of Directors, we can take part in subjects such as teaching at the university, writing, etc.

Confidentiality

Information that belongs to the Sun Group of Companies and may cause a disadvantage in terms of competition, personal rights of personnel, confidentiality agreements concluded with third parties, trade secrets, financial and other information that has not yet been disclosed to the public are considered within the scope of confidential information.

As Sun Group of Companies' employees who have confidential information due to their position or for any reason, we protect confidential information about our activities, and we use this information only for the purposes of the Sun Group of Companies. We never use it for any commercial or personal benefit. Moreover, we take the necessary measures to protect the confidential and personal information of all our stakeholders.

We protect confidential and proprietary information about the company and its activities, production, business, customers, and other professional matters, whether or not they are related to the work we undertake.

Therefore, we take great care in our conversations outside the company to protect confidential information. We do not disclose or share any confidential information and documents that we obtain due to our position or for any reason, to the public or to other persons or competitor organizations

when we are employed or leave the company for any reason. We continue these obligations even if our business relationship is terminated. We only disclose this information to the relevant persons within the scope of their authorities.

We protect the rights of our employees in accordance with the "Law on the Protection of Personal Data No. 6698" and secure them using our Personal Data Protection Procedure No. P/IK/21/R1_10.04.2021.

Communication with Our Suppliers/Business Partners

As the Sun Group of Companies, we attach importance to creating the highest level of value for both parties, identifying and meeting mutual needs.

All suppliers are members of our team. We treat them honestly, fairly, and respectfully, and fulfill our obligations in time. We protect the confidential information and documents of our suppliers and business partners, and we show the necessary care and sensitivity to their corporate and personal integrity. We observe employee rights, and we expect our suppliers and business partners not to employ uninsured and child labor.

We do not establish a private business relationship with customers, suppliers, subcontractors, and other persons and/or organizations with whom we have commercial relations; we do not get or give debt, special discounts, goods, or services for personal purposes. Sun Group of Companies bases its commercial relations on the principles of professionalism, honesty, dignity, courtesy, and reliability. We avoid humiliating and discriminatory attitudes in all kinds of written and verbal interactions. We do not collaborate with business partners and suppliers that do not comply with the Principles of Business Ethics and the law.

Our customers or suppliers:

- We do not mislead them and do not take an unfair advantage over them,
- Purchases from the suppliers and sales to customers are carried out based on appropriate considerations such as quality, price, reliability, sustainability, and commitment to human rights,
- We treat all potential suppliers equally and honestly when purchasing goods or services on behalf of the company,
- We do not offer gifts or assistance to acquire or retain a business,
- We select customers, suppliers, and contractors considering the lists of prohibited parties in terms of terrorism, money laundering and trade prohibitions, export controls, and anti-boycott laws.

OCCUPATIONAL HEALTH AND SAFETY

As Sun Group of Companies, we aim to fully ensure occupational health and safety during work and in all our companies' fields of activity.

All of our employees are aware of the company's safety standards, have information about what to do in an emergency, the nearest fire exit, the location and use of the fire extinguisher, and the alarm.

Our employees do not keep any item or substance that is illegal or poses a hazard to the workplace and/or employees. Our employees do not have drugs, substances that are addictive and restrict or eliminate mental or physical abilities in the workplace, except for those based on a valid physician report, and they do not work in the workplace or within the scope of work while they are under the influence of such substances.

Considering the workplace hazard class and working conditions, employees must be over the age of 18.

Lifelong Learning and Development/ Sun Academy

We determine the training needs of our employees together with them considering the results of their performance and personal and/or company's business development needs.

We plan the compulsory training programs that must be given in accordance with laws, regulations, legislation, quality standards, and/or customer requirements.

We aim that the training and development opportunities provided to our employees develop skills and competencies to meet the required needs, contribute to the improvement of their performance, and/or provide information for the development of existing expertise.

We measure the effectiveness of training and development programs with the determined evaluation criteria and take the necessary measures to improve them.

- We provide Orientation Training to our newly recruited or newly appointed employees to enable them to adapt quickly to our group.

- We provide the Compulsory Training Programs in time within the framework of OHS and other legislation. We ensure that our employees receive Professional Development Training Programs designed by the department director taking into account the company's goals and business plans so that they can perform their jobs better.

- We plan Corporate and Personal Development Training Programs according to the positions and jobs of all our employees to create a working understanding among our employees, to improve their competencies, and to create common behaviors.

OUR ENVIRONMENTAL RESPONSIBILITY

As Sun Group of Companies, we aim to develop constantly with a resource and waste management system that will prevent environmental risks to achieve sustainable environmental principles and targets in the production stages by applying the necessary technical developments.

We use all our resources carefully while offering our services and products. We strive to have the least negative impact on the environment with the least possible energy consumption and to prevent pollution. We continuously improve environmental works, promote environmental responsibility, and assist in the development and dissemination of environmentally friendly technologies.

What can I do for the environment in concrete terms?

In this context, we can contribute to our environmental responsibilities by disposing of our wastes in the right separation bins, preventing unnecessary energy consumption in work areas and meeting rooms, using treated water dispensers in our work areas instead of using ready-made plastic water bottles. Moreover, we can make an individual contribution to a sustainable world by preventing unnecessary water and electricity consumption at home, separating waste, consuming responsibly, and informing our relatives about environmental issues.

Our employees act adopting the responsible production and consumption principles in all our processes for the future of our world:

- We take the necessary measures to combat climate change effectively,
- We use our water resources economically,
- We reduce waste at its source and ensure that the resulting waste is properly separated for recycling,
- We support energy conservation and the use of renewable, clean energy (solar power, wind power, etc.),
- We protect nature and support only environmentally friendly activities,
- We adopt and support all activities that will reduce the carbon footprint of our company,
- We strive to reduce greenhouse gas emissions to support the fight against global warming,
- We protect the plants, animals, and all living things that make up the biological richness of the region and thus support biodiversity to preserve the natural balance in the environment we live in.

ETHICS COMMITTEE

An Ethics Committee is established within each of our group companies to protect and improve our Code of Conduct, to update them when required, to examine warnings, complaints, and notices that may arise in cases that violate these principles, and to make the necessary evaluations.

The Ethics Committee of the Company is an advisory committee that considers and comments on suggestions, complaints, and notices about the issues that the employee cannot solve/try to solve with his/her director or Human Resources department can be discussed. It deals with issues that cannot be managed in the natural flow of management within the company.

The Ethics Committee conducts the required investigation regarding the issues raised, and it inspects whether the behavior and/or situation complies with the principles set forth in the Code of Conduct of Sun Group of Companies.

It is affiliated with the Board of Directors of the company.

Members

Another top manager to be elected by the Company's General Manager, the company's Human Resources Business Partner, the HR Director, and the Internal Audit Director are the permanent members of the Company's Ethics Committee. It consists of five members including the General Manager.

The top manager of the department that sends the suggestions, complaints, or notices or where the research is carried out attends the Company Ethics Committee as a guest member upon invitation, when necessary. Sometimes, experts on the subject may also be invited.

Roles and Responsibilities

- Investigates complaints and notices regarding violations of our Code of Conduct or ethical rules announced in case they could not be resolved or cannot be resolved within the company's natural company processes and hierarchy,
- Reports the investigation results,
- Provides opinions and suggestions for the implementation of ethical rules,
- Responds to applications made for consulting purposes,
- If necessary, it consults the relevant authorities about the sanctions or decides on them and suggests.

Code of Conduct of the Ethics Committee

- Conducts its work without any influence and pressure,
- The Ethics Committee listens equally to all parties involved in the evaluation phase,
- If necessary, the Ethics Committee can obtain expert opinion from a third party, without violating confidentiality principles,
- The Ethics Committee conceals the identity of the persons who made the complaint and report,

- The Ethics Committee conducts its investigations on complaints and notices confidentially and protecting human dignity,
- Every request, complaint, and notice is recorded from the beginning to the end of the investigation process. All documents that can be considered evidence collected during the research are kept in addition to these records. At the end of the investigation, these records and studies are archived,
- The decisions taken by the Ethics Committee are immediately implemented, and the results of the investigation are communicated to the relevant units and individuals.

Meeting of the Committee

Ordinary Meetings

Regular meetings of the Ethics Committee will be held four times in the first year of its establishment. In the following years, an ordinary evaluation meeting is held once a year.

On-Demand Meeting

It is conducted immediately when needed. The Ethics Committee convenes immediately when a notice, complaint, or opinion is requested from it. If the addressee of the issue to be discussed in the Ethics Committee is a member of the committee, this member cannot attend the meetings to be held.

Decision Making

The Ethics Committee puts all notifications on its agenda. The Committee conducts an investigation regarding the notification sent to it, collects the required information, examines the relevant documents, applies to witnesses if necessary, and carries out the required works for the immediate resolution of the issue. At this stage, the Ethics Committee acts in accordance with the "Code of Conduct of the Ethics Committee".

The Committee believes in the innocence of the reported person(s) until proven otherwise. It considers the right of defense of the person(s) to be important.

The Committee takes its decisions by majority vote. In the event that similar cases were evaluated earlier, it reviews the previous decisions.

Depending on the severity of the fault and whether the parties have committed the violation intentionally or unintentionally, the Committee may propose sanctions such as a verbal or written warning to the faulty parties, disenfranchisement of career development, removal from office without payment, cutting progress payments, premiums and stock options, dismissal or litigation before the judicial authorities in cases of serious violations.

The letter containing the last decision taken regarding the person(s) is added to the personal file of the employee as part of the registry record.

The decision taken is implemented by the company as soon as possible. The decision is communicated in writing to the concerned party, the person making the notification, the Human Resources department, and other relevant departments by the Ethics Committee. Decisions taken are archived by the Ethics Committee to be consistent in future issues.

Procedure to be Followed in Cases and Behaviors Contrary to Our Code of Conduct

The employees of the Sun Group of Companies must comply with the regulations such as laws, regulations, instructions, regulations, and our Code of Conduct.

The sanctions specified below are applied to those who act in manners and behaviors that will violate the obligation to comply.

The basic principle is to apply the said rules and sanctions equally and without discrimination to all employees to create an efficient working environment in the company.

The Sun Group of Companies Ethics Committee, which is a supreme board, decides on the severity of sanctions and notifies the relevant companies as a recommendation. Ethics Committees are authorized to issue verbal warnings and written warnings and to request termination of employment in the cases to be described in the following sections to preserve the corporate culture and ensure discipline. In cases that are brought to the Ethics Committees, the 6-working-day period specified in Article 26 of the Labor Law No. 4857 does not run until the Committee Decision.

The regulations regarding the employees within the scope of the Collective Bargaining Agreement are reserved.

What should I do if I encounter a situation that I consider unethical?

