



## MİTAŞ INDUSTRY CODE OF CONDUCT

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## 1. Basic Principles and Core Values

Together with its employees, Mitaş Industry aims to deliver products and services at international quality and standards with sustainable and profitable growth while ensuring high customer satisfaction.

Accordingly, it strives to be a symbol of reliability, continuity, and respectability for its country, customers, partners, agents/distributors and dealers, suppliers, shareholders, and employees.

Creating value for our customers and meeting their expectations with quality and consistency is our first priority.

Mitaş Industry's main objective is to conduct all activities within the framework of all applicable regulations, to be the best in quality, service, supply management and our relations with agents/distributors/dealers and suppliers, to create sustainable shareholder value, to act in accordance with ethical standards, to earn our customers' trust, and to grow our company.

To achieve this objective, our fundamental principle is to assume leadership in the fields in which we operate and to be a market leader.

The quality of our products and services begins with the quality of our people. Our path to ensuring the continuity of Mitaş Industry across generations is to attract and employ the best talent, to make maximum use of their abilities, strength, and creativity; to increase productivity; to enable development; and to create a collaborative working environment where solidarity flourishes.

To ensure business continuity, our core principles include generating resources from our operations to make the necessary investments, creating value for shareholders, contributing to the economic and social development of our employees and society, and ensuring the rational use of all resources without tolerating waste.

Mitaş Industry acts in accordance with ethical standards in all business processes and relationships together with its employees.

Employees working full-time at Mitaş Industry may not work elsewhere, nor directly or indirectly carry out work on their own behalf while their employment agreement with Mitaş Industry continues.

Work to be performed by employees for third parties regarding the rights and interests of Mitaş Industry with the written approval of the President or the General Manager to whom they report does not constitute a violation of the above principle. In cases of doubt, an opinion is obtained from the Human Resources Department.

Provided that written approval is obtained from the relevant Directorate and the Human Resources Department, employees may, without disrupting their duties and responsibilities at Mitaş Industry, take part in activities for public benefit with a sense of social responsibility; this does not constitute a violation of the above provisions.

Respect for human rights is a priority at Mitaş Industry.

## 2. Compliance with The Laws and Company Procedures

In all areas affected by its operations, Mitaş Industry is committed to acting in compliance with laws, international conventions to which the Republic of Turkey is a party, company policies and procedures, and ethical rules.

In its relations with public authorities, Mitaş Industry acts with honesty, accountability, and transparency; it ensures that information, documents, and records requested for control and inspection are submitted completely and on time in accordance with legislation.

Employees must know and comply with the legislation related to their duties and Mitaş Industry's policies, procedures, and instructions.

In international business relations, employees must exercise the necessary care and diligence to prevent any situation contrary to the legislation and policies of the Republic of Türkiye, company procedures, the laws of other countries with which business relations exist, and the rules of international law.

Employees are obliged to report to the Human Resources Department any situation they see or suspect to be contrary to laws, company procedures, or the Working Principles. The company endeavors to ensure the confidentiality of the identities of those who make such reports.

## 3. Prevention and Elimination of Discrimination and Harassment

Mitaş Industry is committed to creating a fair, safe, and respectful working environment across all human resources processes, including recruitment, training, promotion, remuneration, working conditions, and termination.

No discrimination or harassment is permitted on the basis of race, language, religion, sect, color, gender, age, disability, ethnic origin, belief, sexual orientation, or other individual differences.

The company applies a zero-tolerance policy against all negative behaviors, including mobbing, ill-treatment, exclusion, and verbal or physical harassment. Persons engaging in such behavior are assessed under the Ethics Violation Reporting Procedure and, where necessary, action is taken under the Disciplinary Regulation.

The receipt, review, and resolution of reports regarding discrimination or harassment are:

- conducted under the responsibility of the Ethics Committee, with secretariat support provided by the Human Resources and/or Legal Departments.

Matters evaluated by the Ethics Committee are recorded;

- minutes, reviews, and decision documents pertaining to the Ethics Committee are kept by the Legal

Department,

- documents relating to violations requiring a disciplinary process are kept by Human Resources, for at least two years in line with the principle of confidentiality.

Even if the ILO's Declaration on Fundamental Principles and Rights at Work and related conventions have not been ratified, Mitaş Industry undertakes full respect for its four core principles—freedom of association, elimination of forced labor, abolition of child labor, and elimination of discrimination.

Details on this subject are set out in **PO-030 Policy on the Prevention of Discrimination and Harassment**.

#### **4. Freedom to Association (Unionization)**

Mitaş Industry does not use physical or psychological violence, threats, intimidation, retaliation, harassment, or abuse against workers who are union representatives or who wish to form or join an organization of their choice.

If union and collective bargaining rights are restricted by law, the employer facilitates, and does not hinder, parallel practices that support independent and free unionization and collective bargaining.

#### **5. Elimination of Human Trafficking / Slavery / Forced or Compulsory Labor**

Mitaş Industry strongly opposes all forms of forced and compulsory labor, including modern slavery, bonded labor, and human trafficking, and rejects child labor that harms children physically or psychologically and deprives them of their right to education.

#### **6. Prevention of Child Labour**

Except for apprentices and vocational high school trainees (interns), no one under the age of 18 shall be employed within Mitaş Industry. Details are set out in **Procedure PR-005**.

#### **7. Environmental Protection**

It is our duty to act with environmental awareness for Türkiye and the world and to spread this awareness.

Mitaş Industry supports preventive approaches against environmental threats, takes initiatives to promote more effective environmental responsibility, and develops environmentally friendly technologies.

Mitaş Industry aims to protect and use natural resources in the most efficient way, to control potential environmental impacts from product design to end-of-life, and to reduce and recover waste at source wherever possible.

Activities are carried out to support recycling and reuse for our employees and other stakeholders and to raise awareness in this regard.

Mitaş Industry supports transparency policies by establishing international collaborations to reduce greenhouse gas emissions.

In selecting suppliers, Mitaş Industry prefers those operating with production systems more sensitive to society and the environment.

## 8. Occupational Health and Safety

Mitaş Industry aims to fully ensure occupational health and safety in the workplace and on duty.

Employees must comply with rules and instructions set for this purpose and take necessary precautions.

Employees may not keep any items or substances in the workplace that pose a danger to the workplace and/or workers or that are illegal.

Except for those present due to work requirements, employees shall not keep or work under the influence of narcotics, addictive substances, or substances that restrict or eliminate mental or physical faculties.

Employees comply with the requirements defined in the Emergency Action Plan to protect themselves, their colleagues, and information and information systems. In the event of terrorism, natural disasters, etc., the Emergency Crisis Desk operates in accordance with the Emergency Action Plan.

## 9. Intellectual and Industrial Property Rights

Mitaş Industry avoids any actions that may violate individuals' patent, utility model, industrial design, copyrights, trademarks, and similar intellectual and industrial property rights or lead to unfair competition. Employees take all necessary measures to ensure compliance and immediately report any non-compliance to the Human Resources Department.

Mitaş Industry is committed to protecting its trademarks and qualified inventions and works by establishing registrations, patents, utility models, industrial designs, and similar intellectual and industrial property rights.

In this context, employees document inventions they make in accordance with Mitaş Industry procedures and notify management. Such inventions and information may not be shared with third parties without Mitaş Industry's written approval.

When confidential information related to Mitaş Industry's intellectual and industrial property rights must be shared with third parties, employees take necessary measures under Mitaş Industry procedures to protect the company's rights.

When employees need software for company computers, they obtain it through the IT Department in accordance with Mitaş Industry procedures. Company computers are used for business purposes only. Personnel may not install software on company computers without the knowledge and approval of the IT Department.

Employees do not disclose non-public confidential information and documents belonging to previous employers to Mitaş Industry or to other employees, nor do they request such information and documents from other employees.

Employees may not copy or use works protected by copyright without the permission of the copyright holder.

Unlawful use, copying, or reproduction of third parties' intellectual and industrial property rights is illegal and may lead to financial and criminal sanctions against those who commit such acts, their companies, and the managers of those companies. Employees must exercise the necessary care and diligence to avoid such liability. The process is managed in accordance with the Disciplinary Regulation.

## **10. Information Management and Confidential Information**

Information security is among Mitaş Industry's priorities. Employees must act in accordance with the Information Security Policy.

Employees must maintain the confidentiality of all commercial, financial, technical, and legal information obtained within the scope of their work; they must not disclose such information to persons or organizations unrelated to the work; where sharing with third parties is necessary for business, they provide only what the work requires and take measures to protect confidentiality.

Employees must comply with all provisions regarding confidentiality in the Employment Agreement and, if any, the Confidentiality Undertaking. Employees must comply with confidentiality obligations even after leaving Mitaş Industry.

Discussing company confidential information in public places is prohibited. Sharing on social media or similar platforms of confidential investments, projects, revenues, business negotiations, products, prototypes, designs, processes, and other trade secrets and confidential information not yet publicly announced by the company is prohibited. In particular, photographing products in the project phase, production areas, and R&D activities—and sending such images to any internal or external third parties—is prohibited.

All documents (correspondence, notes, computer files, e-mails, etc.) used or created by employees in the performance of their duties belong to Mitaş Industry. Storage and destruction of such documents shall be carried out in accordance with Mitaş Industry procedures.

Employees may not use false, misleading, exaggerated, unfounded, ambiguous, or inappropriate information and statements in any documents they use or create in performing their duties.

Employees may not use non-public information belonging to Mitaş Industry to provide benefits for themselves or other persons or organizations.

Passwords, user names, and similar identifiers used to access company information must be kept confidential and not disclosed to anyone other than authorized users.

It is Mitaş Industry policy to support investigations conducted by public authorities and to answer questions asked by public authorities accurately and completely. Requests for information from public authorities are answered by the relevant Department Directorate.

Bringing cameras into the factory or taking photos with mobile phones in areas related to products and production is prohibited.

## **11. Social Responsibility**

While contributing to our country's economic development and enhancing international competitiveness, Mitaş Industry, in line with corporate citizenship, adopts conducting social responsibility activities in many fields—such as education, health, culture-arts, and sports—to help achieve Turkey's sustainable development goals.

Mitaş Industry supports its employees to volunteer for appropriate social activities with a sense of social responsibility.

## **12. Contract Policy and Legally Binding Transactions on Behalf of the Company**

In all cases where the Company enters into a business relationship with third parties, a Contract setting out the rights and obligations of the parties must be signed before the business relationship begins.

Contract processes are carried out by managers at least at the Manager level ("Contract Owner") in accordance with the relevant written processes.

Where a contract concerns more than one department, the Contract Owner must inform the relevant Department Manager.

Employees other than those designated as Authorized Representatives in the Board of Directors Directive and those specifically authorized by a power of attorney by Mitaş Industry cannot represent Mitaş Industry, undertake any commitment on behalf of the company, sign on behalf of the company, or conduct transactions or correspondence.

Authorized Representatives designated in the Board of Directors Directive and employees specifically authorized by Mitaş Industry must act within the limits of authority specified in the directive or the relevant authorization document when conducting transactions on behalf of the company.

When considering extending contract terms, procurement and purchasing processes are re-initiated a reasonable time before the end of the contract term. If it is decided to extend, the necessary extension protocol is signed before the contract expires in accordance with the Board of Directors Directive.

If non-compliance with contract provisions is detected, determining the situation and sending the necessary notice to the counterparty is the duty of the Contract Owner.

## **13. Competition**

Mitaş Industry conducts its activities with a Zero-Risk policy regarding compliance with Competition Law. Within this framework, all employees avoid any actions that may pose a risk under Competition Law.

Under no circumstances does Mitaş Industry enter into agreements with competitors or other companies in a particular goods or services market that have the purpose, effect, or potential effect of directly or indirectly preventing, distorting, or restricting competition, nor does it engage in concerted practices.

Where Mitaş Industry holds a dominant position in a given market, alone or together with other undertakings, it never abuses this dominant position through agreements or concerted practices.

Employees of Mitaş Industry are strictly prohibited from sharing Competition-Sensitive Information of Mitaş Industry with competitors or receiving competitors' Competition-Sensitive Information from competitor employees. Without limitation, non-public trade secrets that could distort or restrict competition if shared with competitors—such as product prices, price changes, increase rates and dates, pricing strategies, discounts, profit, bid prices and other terms, production volumes, capacity utilization, stock, sales, orders, exports, imports, sales targets, costs, investment plans, customer lists, dealer incentives and bonuses—are considered Competition-Sensitive Information.

Meetings of associations, chambers, and similar trade bodies where employees come together with competitor employees carry high risk for Competition Law violations. If Competition-Sensitive Information is likely to be discussed or if there is a possibility of non-compliant discussions, agreements, or decisions, Mitaş Industry employees do not attend such meetings; if already present, they leave immediately and notify the Human Resources Department in writing.

Mitaş Industry respects the freedom of its dealers and authorized services to determine their own sales prices, profit and discount rates, and avoids any actions or statements that may create the impression that these freedoms are restricted.

Employees fully comply with the company's established procedures and instructions, ensure compliance within their department, give necessary warnings, and consult the Human Resources Department whenever in doubt about Competition Law.

#### **14. Prohibition of Political Activity**

Mitaş Industry may not engage in activities supporting political parties, politicians, or political candidates, nor make donations to such persons or organizations. Demonstrations, propaganda, and similar activities are not permitted within Mitaş Industry workplaces. Company resources (such as vehicles, computers, e-mail) cannot be allocated for political purposes.

#### **15. Product Safety and Quality**

Product safety and quality are priority objectives for Mitaş Industry and its employees. Employees are responsible for ensuring product safety and quality in accordance with company standards and procedures.

Mitaş Industry and its employees aim for continuous improvement to maintain product safety and quality. Spreading quality culture to employees and business partners/suppliers is among our priority goals.

#### **16. Relations with Stakeholders**

Mitaş Industry adopts the principle of acting courteously, professionally, and fairly at all times in its relations with customers, dealers, authorized services, suppliers, contractors, other stakeholders, and the public. Employees are obliged to act in accordance with this principle.

Employees may not engage in any behavior—either while performing their duties or in their private lives—that would damage Mitaş Industry’s reputation before the public or persons and organizations associated with Mitaş Industry, or that would put the company in a legally difficult position.

Employees particularly avoid any acts, transactions, statements, or behaviors that are offensive, harmful, reputation-damaging, humiliating, dishonest, discriminatory, or that provide unfair competitive advantage to someone or may be perceived as such.

It is the duty of Mitaş Industry and its employees to stand behind our products and to support our customers after sales.

Mitaş Industry aims to be the leading company in its sector in terms of customer satisfaction and loyalty. In this framework, employees are always sincere, respectful, and helpful in all customer relations and immediately forward all customer applications to the Quality Assurance and FAT Units.

Personal relations with suppliers, dealers, and customers must never influence employees’ decisions. Employees may not use their relationship with Mitaş Industry to obtain benefits for themselves or third parties.

## **17. Anti-Corruption and Situations Regarded as Improper or Illegal**

Mitaş Industry operates with a **Zero-Risk** policy in the fight against corruption. All employees must comply with Mitaş Industry’s procedures and instructions.

Mitaş Industry is aware of its legal obligations and social responsibility regarding money laundering, financing of terrorism, and other crimes.

Employees may not, directly or indirectly or through third parties, offer, promise, or provide bribes, any benefit, or facilitation payments to any person or organization.

Employees may not, directly or indirectly or through third parties, accept or receive bribes, any benefit, or facilitation payments from any person or organization.

Employees perform their duties to maximize Mitaş Industry’s interests within the framework of Working Principles, ethical rules, and procedures. Principles to prevent potential conflicts of interest in relations with persons and organizations that have or seek a business relationship with Mitaş Industry are as follows:

- No gifts or promotions may be accepted other than promotional items and gifts **not exceeding TRY 1,000** in value and that do not create the impression of impropriety. Gifts/promotions exceeding a market value of TRY 1,000 must be politely returned.
- No gifts or promotions may be given other than promotional items and courtesies **not exceeding €100** in value and that do not create the impression of impropriety.
- No discounts or benefits may be accepted or applied that are not generally available to all regarding any goods or services.
- Cash, gift cards, or precious metals may not be given or accepted as gifts.
- Loans may not be obtained from banks and financial institutions under conditions other than those available to everyone.
- Employees may not request or accept support from any person or organization doing business with, or likely to do business with, Mitaş Industry for leisure, training, sports, or

entertainment activities. Where employees solicit donations for social or charitable purposes, special care must be taken to ensure donors are not influenced by the employee's role at Mitaş Industry.

- Except for publicly conducted company events or official assignments made in accordance with the law by the relevant public institution, public officials who have authority to take actions or grant approvals related to Mitaş Industry may not be invited to activities for leisure, training, sports, entertainment, etc.
- Except with the approval of the President, General Manager, or Human Resources Department, no function of Mitaş Industry or its employees may give gifts on behalf of Mitaş Industry to other employees or their families. (Support activities such as social responsibility projects, scholarships, sponsorships are exceptions.)
- Without the approval of the Human Resources Department, employees may not use the Mitaş Industry name to support any activity, association, person, or organization or to provide benefits.
- Holding shares or interests in a company that has a relationship with Mitaş Industry or seeks to do business with Mitaş Industry is only possible with the approval of the **Board of Directors**. Employees must immediately notify the Human Resources Department of any material interest they or their relatives have in companies that have relations with Mitaş Industry or in transactions with Mitaş Industry.
- Managerial employees may not borrow money from their subordinates, and employees may not request their managers to act as guarantors for such transactions.
- Employees may not, without the approval of the President or General Manager, attend invitations to activities that may influence decision-making or be perceived as such—such as sports events, domestic/overseas trips—other than publicly open conferences, receptions, promotional events, and seminars organized by persons or institutions with whom a business relationship exists or may exist.
- Employees may not ask Mitaş Industry personnel or subcontractor personnel under their supervision to perform work outside their duties and responsibilities at Mitaş Industry. No paid or unpaid activity may be requested outside working hours.

Employees are obliged to report to their immediate supervisors and the Human Resources Department any situation they suspect is not compliant with laws, company policies, or instructions regarding **Corrupt Practices** (as defined in the Disciplinary Regulation).

## 18. Ethical Rules

In performing their duties, employees base their conduct on continuous improvement, participation, transparency, impartiality, honesty, the benefit of Mitaş Industry, accountability, predictability, and reliance on declarations.

Employees aim to facilitate daily life in the workplace, improve work/product quality, increase employee satisfaction, and be result-oriented.

Managers at Mitaş Industry use their managerial authority in accordance with professional standards and corporate discipline, and they inform employees about work processes by providing necessary explanatory information.

Employees may not engage in pressure, insults, threats, arbitrary behavior, or practices while performing their duties.

Employees act in a manner worthy of the trust required by their duties and exercise the necessary care and diligence in conducting work. The company does not tolerate neglect of duty or abuse.

**Conflict of interest** refers to any situation in which employees possess interests or similar personal gains that affect, appear to affect, or are perceived to affect their ability to perform their duties impartially and objectively, and that provide benefits to themselves, their relatives, friends, or persons or organizations with whom they have relationships. Employees bear personal responsibility for conflicts of interest; they exercise caution regarding any potential or actual conflict, take steps to avoid conflicts, inform their superiors as soon as they become aware of a conflict, and refrain from benefits falling within the scope of conflicts of interest.

Employees may not use Mitaş Industry buildings and vehicles or other Mitaş Industry property and resources for purposes other than Mitaş Industry's objectives and service requirements, nor allow others to do so; they protect these assets, use them rationally, and take necessary measures to keep them ready for service at all times.

Employees avoid waste in the use of all company resources and act efficiently, effectively, and economically when using working hours, company property, resources, workforce, and opportunities.

Managerial employees take necessary measures to prevent all kinds of abuse within their areas of responsibility and to ensure compliance with these Working Principles. These measures include implementing legal and administrative regulations, conducting necessary audits and controls, carrying out appropriate training and information activities, paying attention to financial and other difficulties faced by their staff, and setting a personal example.

## **19. Business Relations of Former Employees with Mitaş Industry and Its Subsidiaries**

It poses a risk of conflict of interest and ethical concerns when persons employed by Mitaş Industry or its affiliates engage in business with Mitaş Industry after leaving—personally or as a partner/manager of a company—through selling, contracting, consulting, brokerage, representation, dealership, or similar means. To eliminate these risks and concerns, all employees must comply with the following rules:

- No business may be conducted with such a person or a company in which that person is a partner/manager until 2 years have passed since the person left employment.
- The person's former employment in Mitaş Industry or the Mitaş group can never be a reason for preference.
- Company procurement rules must be observed in doing business with such persons/companies.
- In all such cases, the General Manager must be informed.
- Exceptions to this article are only possible with the knowledge of the Human Resources Department and the written approval of the President or the General Manager.

## **20. Protection of Personal Data and Customer Data**

All types of information belonging to a real person who is identified or identifiable are considered Personal Data. In addition to this definition a name, surname, marital status, date of birth, vehicle plate, voice and image records, fingerprint are also personal data. These types of data belonging to the employees and visitors of Mitaş Industry, and employees and partners of Mitaş's distributors,

visitors, suppliers, sub-contractors, authorized service providers, and potential customers are also Personal Data.

Personal Data: cannot receive or saved in Mitaş Industry' systems except for: (i) The legal necessity with regards to Mitaş Industry, (ii) a contractual relationship with Mitaş Industry, (iii) as per Mitaş Industry's legitimate interests iv) a documented approval of the relating persons.

Personal Data is qualified as Confidential Information, thus, its access is restricted and controlled. Personal data cannot be stored outside the data storage unit determined and approved by the company. Personal Data cannot be saved on the employee's computer unless approved by Nitaş Industry with an administrative decision.

The employees of Mitaş Industry are obliged to comply with the procedures and directives in relation to obtaining, preserving, accessing, using, transferring to third parties, sharing with foreign countries, making a subject to contracts, erasing, anonymizing Personal Data, and satisfying the owner of Personal Data. In case of a violation of legal regulations, legal and punitive sanctions may be arisen, including imprisonment.

Communication with the available or potential customers for the purpose of marketing, advertising, campaign, survey, research, introduction, or collecting data is not allowed. Before having such communication it should be ensured as per company procedures that the relating approvals are available.

The employees cannot use Personal Data that they have obtained in relation to the activities of Mitaş Industry other than business purposes.

The employees are responsible for notifying the Human Resources Directorate of all cases contrary to the procedures and directives relating to Personal Data.

## 21. Implementation Principle of Code of Ethics

### 21.1. Obligation of Notification of Violations

To ensure the sustainable implementation of ethical rules, Mitaş Industry provides employees and stakeholders with a system through which unethical behavior can be reported safely.

Every employee is obliged to notify the **Ethics Committee** when they detect a situation contrary to the Working Principles or applicable legal regulations. Reporting is regarded as a corporate responsibility for protecting the principles of transparency, accountability, and honesty.

Confidentiality is essential throughout the reporting process. It is strictly forbidden to disclose the report to third parties in a manner that would adversely affect the person's peace at work or relationships. The reporting mechanism must be used in line with company interests and must not be used to damage the career or reputation of the person reported.

Accordingly, confidentiality, objectivity, and compliance with ethical rules are essential in reporting and investigation processes. Both the reporting person and those evaluating and managing the report must pay maximum attention to these matters.

Making deliberately slanderous, false, or malicious reports is considered a violation of the Working Principles and is handled within the disciplinary process.

## 21.2. Ethics Committee

Mitaş Industry's permanent **Ethics Committee** is responsible for receiving, evaluating, and concluding all reports of conduct contrary to the Working Principles.

The Ethics Committee is appointed annually by the Board of Directors and consists of the following positions:

- **Chairperson:** The most senior executive appointed by the General Manager
- **Member:** Legal Counsel
- **Member:** Human Resources Manager

The Ethics Committee operates under the Board of Directors and acts with independence, impartiality, and confidentiality in all its work.

### Main duties of the Ethics Committee:

- Ensure the establishment and development of an ethical culture across the Group,
- Periodically review the currency and suitability of ethical rules,
- Examine, evaluate, and conclude ethics violation reports submitted to it,
- Keep the identity of reporting persons confidential and ensure protection against retaliation,
- Ensure preventive actions are taken to avoid recurrence of ethical violations.

## 21.3. Ethics Committee Working Procedure

In case of potential conflicts of interest or reports, they must be reported in writing or verbally to one of the Ethics Committee members.

- Phone number for reporting: 0312 296 23 23
- Email for reporting: [etik@mitasindustry.com](mailto:etik@mitasindustry.com)
- Ethics Reporting Form: Available on Mitaş Industry's website.
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The Ethics Committee member who receives the report informs the other committee members about the matter. If deemed necessary, the Committee assigns employees from the Audit Department to conduct an investigation into the matter.

The results of the review and investigation are evaluated at the Ethics Committee meeting.

Actions, measures, and sanctions to be taken are decided by unanimity or majority vote.

Where the Ethics Committee determines a violation of the Working Principles, it issues a recommendation decision. If the violation also falls within the scope of the company's Disciplinary Regulation (YO-004), the matter is referred to the Disciplinary Committee. Depending on the employee's status, the Disciplinary Regulation or Collective Bargaining Agreement provisions apply.

Where a disciplinary sanction is not required, the relevant employee may be warned verbally or in writing. All matters evaluated and concluded by the Ethics Committee are reported to the Board of

Directors. The Ethics Committee also convenes at year-end to review complaints and actions taken during the year.

#### **21.4. Prevention of Retaliation**

Mitaş Industry guarantees that persons who report ethical violations will not be subjected to retaliation or victimization under any circumstances.

Persons who report may not be dismissed, punished by reassignment, subjected to negative performance evaluations, or discriminated against in any way due to their complaints.

If there is suspicion of retaliation, the matter is immediately addressed by the Ethics Committee and an investigation is initiated. If retaliation is identified, sanctions are imposed on the relevant person in accordance with the Disciplinary Regulation.