

**ULUS METAL SANAYİ VE TİCARET
ANONİM ŞİRKETİ**

&

ULUS METAL POLSKA SA

- Code of Conduct -

PREPARED BY Saadet Subasi	CONTROLLED BY Ahmet Turan GÜVEN	APPROVED BY PRZEZ Ragıp TUNALILAR
-------------------------------------	---	---

Table of Contents

1. Purpose	3
2. Work Ethics	5
2.1. Regulatory Compliance and Ethics	5
2.2. Our Competition and Anti-Trust Policy	6
2.3. ULUS METAL Gift Policy	9
2.4. ULUS METAL Policy on Zero Tolerance on Bribery	12
2.5. ULUS METAL Policy on Combat Against Corruption	13
3. At ULUS METAL We Protect our Assets	14
3.1. Principle of Honesty while Financial Reporting	14
3.2. ULUS METAL Intellectual Property Policy	15
3.3. Safe Keeping of the Company Equipment and Materials	16
4. At ULUS METAL We Protect our Data	18
4.1. Protection of Company Data	18
4.2. Protection of Personal Data	20
4.3. ULUS METAL Social Media Policy	21
5. Professionalism at Work Life and Legal Compliance	23
5.1. Avoiding Conflicts of Interest	23
5.2. A Courteous Workplace	24
5.3. Zero Tolerance on Mobbing	25

5.4. Policy on Fighting with Discrimination	29
5.5. Policy on Sexual Harassment	31
5.6. Policy on Full Legal Compliance in Working Life	33
5.7. Policy on Full Compliance with Trade Rules	34
6. Ulus Metal Complaint Mechanism	36
7. Making Right Decisions at the Right Time.....	37

1. PURPOSE

At ULUS METAL family, it is our utmost desire to conduct our all operations and business within an uncompromised atmosphere surrounded with the principles of respect, fairness, equality, reliability, commitment and responsibility.

i. **Respect**

We see our diversity as an advantage; we listen, understand and value each and every idea. Respecting all our stakeholders, nature, living beings, labor, values produced, our work, our work environment, laws, knowledge and experience are among our primary principles.

ii. **Fairness**

We act with fairly and justly when taking decisions; prioritizing merits. We base our actions on evidence, evaluating all factors.

iii. **Integrity**

Our stance is in line with our words; our actions reflect us. Even if the conditions change, we do not refrain from speaking the truth. We act with integrity towards ourselves, each other, our customers, our suppliers and the society we live in.

iv. **Equality**

Everyone is treated equally, regardless of differences in faith, language, ethnicity, culture or gender.

v. **Reliability**

We form trust based, long-term relationships with our employees, customers, suppliers and all the institutions we are in association with.

vi. Commitment

We are passionately committed to our corporation, work, colleagues, our common mission and values, we support each other to progress, we share knowledge and create opportunities for individual growth.

vii. Responsibility

We contribute constructively to ourselves, all our stakeholders, society and the environment, and act with the responsibility of fulfilling our commitments.

viii. Transparency

Our organization prioritizes the value of transparency in relationships between teams and employees and in all its processes. The availability of all information to be shared in a coordinated manner within and between units is a constant component of our efficiency and customer satisfaction.

We are well aware that we are empowered within, from our team members. In this respect, we take all measures within the perspective of these principles in order to ensure happiness and productivity of our team members during their work period.

These in mind, the “Guide” has been prepared in order to help our team members while they look for solutions to daily problems that they may encounter, to provide guidance in their strategic planning and decision-making processes and to assist them in making more accurate, ethical and incisive decisions during the daily flow of work life.

This Guide, which should be deeply regarded by each and every member of the ULUS METAL family, is deemed to be the key to establishing a happier workplace for our team members, having our customers experience the perfection and protecting and improving ULUS METAL values.

At this point, it shall be highly emphasized and reminded that, violation of any principle or rule encapsulated by the Guide may result in the termination of employment contract or imposition of criminal or administrative sanctions within or outside of the Company concerning the respective team member.

2. Work Ethics

2.1. Regulatory Compliance and Ethics

At ULUS METAL family, we know that the key to a genuine and sustainable success depends on paying regard to work ethics above all. Thus, all of our team members are expected to highly respect rules of ethics and conduct their operations in compliance with the laws.

In order to establish of a happy and constructive working atmosphere and to give our customers a better service, continuous display of utmost honesty and compliance with legislative instruments is the first and foremost step.

Among the most important responsibilities of ULUS METAL employees, there lies absolute compliance with relevant legislation, principles of this Guide, prior perceptions and understandings cultivated in common sense and within values of the respective ULUS METAL employee. These rules and values should not be violated under any circumstance, especially under the influence of a pragmatic approach which may invoke illegal behavior or making inaccurate and false declarations.

One shall not forget that even a single misleading behavior, inaccurate statement or the like to our business partners, customers or public or private bodies may cause irreparable damage to ULUS METAL's affairs.

Avoiding misleading behavior and inaccurate statements is a bilateral practice. For such reason, while ULUS METAL members shall not make any concession from displaying complete honesty, they shall also make sure that they are being treated with integrity as well. If witnessed, any dishonest behavior or inaccurate statement of counterparty shall be strongly objected and shall be reported to immediate superior or legal affairs department in order for necessary actions to be taken.



Fundamental Values

- Employees shall create a web of relationship between themselves, business partners, customers and public institutions that is based on integrity. In this perspective, our team members shall avoid and refrain from any sort of dishonest, unreal, inaccurate or misleading behaviors or statements.
- Employees shall not make any sort of concession from integrity whilst attempting to complete goals or business target that are assigned to them.
- If witnessed, employees shall take all necessary measures in order to prevent misleading behavior or violation of laws and they shall directly report to the Human Resources Department or communicate it through e-mail at sikayet@ulusmetal.com.tr (Turkey) or zgloszenie@ulusmetal.com.pl (Poland).
- Under any circumstances, employees are expected to act in compliance with laws and regulations.
- Employees shall perceive and understand applicable legislative instruments to their job titles and follow relevant amendments in the applicable legislation accordingly.

2.2. Our Competition and Anti-Trust Policy

At ULUS METAL, we believe in the necessity to operate within a just competitive system where the rights of our sector stakeholders are observed. Therefore we follow an uncompromised competition policy within prescribed legislative boundaries.

We acknowledge that quality products can only represent their actual worth within competitive markets.

At ULUS METAL, we support competitive markets and never engage in unethical practices in our R&D, marketing, servicing and other activities. Each and every ULUS METAL employee must show due respect to these sensitivities and respect competition laws and regulations in their works. In this respect, unfair competition practices are never allowed at ULUS METAL and there is zero tolerance on any kind of agreements,

decisions or practices against prevention, restriction or distortion of competition within the boundaries of competition law.

In this regard, ULUS METAL employees shall be honest to our customers concerning our products or services and refrain from misleading or deceiving behaviors. Moreover, it is strictly forbidden to make false accusations against rival companies of ULUS METAL.

a. ULUS METAL Policy on Protection of Competition

A zero-tolerance policy on agreements, actions or initiatives that carries potential of preventing, distorting or restricting competition is applied at ULUS METAL as one of the main pillars within protection of competition policy.

It is within such concept that, ULUS METAL employees shall absolutely not;

- Apply discrimination, directly or indirectly, by proposing different business conditions in exchange for the same rights and obligations to potential buyers that are in equal positions,
- Indirectly or directly prevent other undertakings to enter the market or conduct activities for the purpose of having rival companies experience difficulties within the market,
- Distort, prevent or restrict competitive conditions at commodities or service markets by taking advantage of a dominant market position in terms of finance, technology and commerce.
- Impose reselling restrictions such as conditioning the sale of one product on the purchase of another product (tied selling) or requiring intermediary undertakings to take on additional goods and services to be able to purchase and sell the ones that they actually request or setting minimum reselling prices.
- Conclude any verbal or written agreements with other undertakings or their employees concerning price-fixing,
- Conclude any agreements with other undertakings or their employees concerning allocation of a market, an area or customers,

- Conclude any verbal or written agreements with other undertakings or their employees concerning preventing an undertaking to enter into markets,
- Conclude any verbal or written agreements with other undertakings or their employees concerning boycott of a specific company.

b. ULUS METAL Policy on Unfair Competition

- c. Unfair competition means a set of actions, behaviors and commercial applications that collectively targets restriction, prevention and distortion of commercial ties between market rivals or customers and their suppliers.
- d. In this context, ULUS METAL employees shall act in integrity towards customers regarding products and services by entirely avoiding dishonest and deceiving behavior. Moreover, ULUS METAL employees shall completely refrain from making inaccurate statements in relation with rival competing companies.



Please use caution

- Avoid sales methods or advertisements that are deceiving and in violation with principle of good faith.
- A customer shall not be forced or suggested to terminate or violate any existing contract.
- Products of other rival companies shall not be unfairly taken advantage of.
- Business or production secrets of rival companies shall not be disclosed with public without any permission.
- Information concerning other companies that are of commercial and competitive nature shall not be collected through any illegal or unethical means and or such collection shall not be requested from any third parties.

2.3. ULUS METAL Gift Policy

It is unavoidable that, during cultivation and development of personal connections as well as gaining confidence of stakeholders, some gestures may be exchanged between the parties. Indeed, such practice, especially distinguishable as a specialty of our

geographical diversity, poses a significant medium in order to create, develop and sustain personal relationships.

Having said above, within the daily flow of business life, parties' exchange of gifts within certain limits, organization of work lunch or dinner, as well as business trips are considered normal. However, each ULUS METAL employee shall make a clear-cut distinction between normal situations and others which represent extraordinary circumstances.

As a rule, it shall be known that, if exchanging of gifts appears to be conflicting with ULUS METAL's interests, then, such exchange would be a violation of this Guide and ULUS METAL's principles.

If exchange of gifts or presents may invoke inappropriate thoughts concerning the recipient, donor or ULUS METAL, relevant present of gift shall not be accepted and such proposal shall be absolutely rejected.

It shall be known that there is a fine tuning between a gift that is within acceptable limits of ethics and courtesy, and a gift that is above latter limits, which thus most probably will be interpreted as bribery. Indeed, a distinction between a legitimate or illegitimate gift may sometimes be extremely hard to make. That said, there is a direct proportion between the value of the gift and its illegitimacy. For this reason, ULUS METAL expects its employees to refrain from exchanging of gifts that may cause misunderstanding.

In addition to above, ULUS METAL employees are forbidden to, directly or indirectly, accept gifts, valuable articles, invitation to leisure events or privileged treatment arrangement from current or prospective business partners of ULUS METAL.



It also known that under some circumstances, refusal of gifts that are already sent may be interpreted as discourtesy by the parties who have sent such gifts.

Successful management of these scenarios goes through accepting such gifts, but transferring or making use of such gifts for another purpose.

For example;

- Perishable products such as beverages, foods shall be shared with co-workers,
- Items that are of decorative value, such as paintings, vases, flowers, shall be put within the office space,
- If appropriate, relevant gift shall be donated to a NGO or a charity.



Please use caution

Gifts that are to be presented to 3rd parties

- Shall not exceed a *reasonable* financial value.
- Shall not presented within a regular frequency which may jeopardize moral values of ULUS METAL.
- ULUS METAL employees are strictly forbidden to accept or provide gifts or presents that are equal to cash or other cash equivalent documents.
- It shall be not forgotten that gifts or presents that are provided on demand shall no longer be a present or gift.
- A ULUS METAL employee shall absolutely refrain from any act which may create an impression that he/she is giving a present in order to secure a demand, to benefit from a financial or other type of advantage, to have a saying over a third party's action or for other similar purposes.
- If ULUS METAL employees realize that a present or a gift that are provided to them are inappropriate and therefore may act as a medium for other illegitimate purposes, then they shall kindly refuse by replying that they need the approval of their superiors before accepting such a gift. Therefore, simultaneously, ULUS METAL management will be notified and any misunderstanding concerning acceptance of the gift will be prevented.
- An ULUS METAL employee who has hesitations about accepting a gift may ask him/herself the following non-exhaustive questions; Would it be appropriate if my family, friends or relatives know about this situation? If I accept that gift, how would I feel when my social circle learns about it? Indeed, if answers to such

questions are negative, then the ULUS METAL employee shall not under any circumstances accept that relevant gift and refrain from any consequent action.

- At last, if there is a persisting hesitancy with regards to the acceptance of the gift or present, it is advised that the relevant ULUS METAL superior or legal department shall be informed.

2.4. ULUS METAL Zero Tolerance on Bribery

It must be said that while ULUS METAL zero tolerance on bribery strictly prohibits and prevents bribery, it also advises ULUS METAL employees to enter into any sort of relationships with 3rd parties that may be misinterpreted as bribery.

Definition of “Bribery”

- According to international consensus, bribery is defined as “Providing any benefit to a public officer or a third person whom is determined by the latter, in order public officer to conduct or act otherwise concerning a matter.
- Moreover, mere act of “offering” or “making a promise” about a benefit to a public officer suffices to conclude that bribery is committed.
- In the context of bribery, the financial benefit may not only be in cash, it may also be in other forms including cell phones, immovables, cars or any other assets that can be measured by value. That said, even coupons, dinners, trips or event tickets may qualify as a bribe.
- Importantly, the benefit in question does not have to carry an economic value, any kind of benefit would suffice, even if provided indirectly.

Please use caution

- While initiating relations with public officers, be direct and accurate by eliminating any avenues for any misunderstanding. If possible, keep record of communication with such public officers without violation privacy of communication. In this regard, especially keeping record of written communication would prove useful.
- If any ULUS METAL employee receives impression that a public officer is directly or indirectly asking for bribe, immediately get in touch with ULUS METAL legal department.
- If any ULUS METAL employee receives an indirect or direct request from a public officer concerning making a donation to a charity, one shall act in prudence and notify the Human Resources Department and Legal Department.

2.5. Ulus Metal Policy on Fighting with Corruption



Corruption can be defined as the abuse of the power given by a person's position, regardless of whether it is in the public or private sector, in order to obtain benefits.

The benefits that can be obtained within the scope of corruption can be cash payments, as well as various behaviors such as donations to the institution nominated by the person, providing commissions, giving gifts, etc.

Ulus Metal does not make any concessions against corruption that may originate from the public or private sector. In this context, Ulus Metal employees are strictly prohibited from abusing their position in order to gain benefits. In addition, behavior that may be perceived as corruption by the other party or other third parties should be avoided.

3. At ULUS METAL We Protect Our Assets

3.1. Principle of Honesty in the Financial Reporting

At ULUS METAL, we are aware that doing business by the principle of financial honesty is essential for corporate companies.

In our view, having financial assets managed in the best and most efficient manner is the key to distinguish ourselves in the competitive markets.

In this respect, we expect ULUS METAL employees to follow ULUS METAL's specific pre-set financial reporting rules.

ULUS METAL employees should be diligent about having the financial data accurate, complete, appropriate and comprehensible.

Our employees should remember that the information on the financial reports are more than just data concerning expenditures but they are decisive on how ULUS METAL is perceived as a corporation before the eyes of its customers, investors, business partners and public authorities.



Please use caution

- Financial and other records should be kept systematically. Employees should learn about the established instructions, which may be updated from time to time, on how to keep, preserve and dispose of these records.
- There should be no transfer between expenditures for the purposes of having records matched with the financial statements and budgets.
- Accounting records should be processed under the relevant accounting period. No expenditure should be moved to previous or subsequent accounting period in order to meet a target.

- Records should be processed within the relevant accounting period.

3.2. ULUS METAL’s Policy on Intellectual Property Rights

ULUS METAL knows that its competitive and innovative identity derives from the intellectual property resources that it possesses.

ULUS METAL believes that intellectual property rights should be duly protected in order to preserve its competitive identity in the free market economy.

Intellectual Property means all economic and moral rights as well as neighboring rights over a creation.

Industrial Property, on the other hand, means right to have an industrial and/or agricultural invention, innovation, new design or a novel work registered under the name of its first performer; right to have signs/symbols/words/graphics etc. that are used to identify a producer or seller of a commercial good registered under the name of its owner. This way, the first applicator holds the right to produce and sell the good for a certain period of time.

Intellectual and Industrial Property Rights may be listed, but not be limited to, as below:

- Copy Rights
- Patents
- Utility Models
- Designs
- Trademarks
- Integrated Circuit Topographies
- Computer Programs
- Commercial Secrets
- Know-How (Technical Knowledge)
- Business Models

ULUS METAL employees are obliged to protect company’s intellectual property rights and to have them secured from of an unauthorized party seizure.

In circumstances where it is necessary to share information related to intellectual and industrial property rights with thirds parties, appropriate measures should be taken such

as getting in touch with the legal department, signing a confidentially agreement and asking the relevant company and persons to follow any other rule specified in the Information Protection Policy.

In addition, ULUS METAL takes necessary measures to protect the intellectual property rights of third parties including our customers and business partners.

ULUS METAL employees are expected to respect the intellectual and industrial property rights of customers, business partners and other third real or legal persons. In cases of unauthorized use or steal of other's intellectual property rights or any violation of such, ULUS METAL shall take necessary civil and criminal legal steps concerning the person committing this act.

Please contact legal department should you have any hesitations regarding violation of intellectual property rights.

3.3. Safe Keeping of the Company Equipment and Materials

ULUS METAL provides its employees with equipment and materials furnished with the newest technology in order to present an efficient work environment and expects everyone to use the entrusted material with care.

Company equipment consists of any asset that is allocated for the use of the employees in any manner to carry out work related activities. Software found in computers and mobiles should also be used according to these principles along with tangible assets such as computers, printers, company mobiles, company cars and the office equipment.

ULUS METAL employees are responsible for using the company machines and equipment solely for work related purposes and protect them from any harm, misuse, getting stolen or lost.



Please use caution

- When using company machines and equipment's, all relevant rules, instructions and prescriptions should be observed, and utmost attention must be given during their usage.
- Company materials and equipment must not be used outside of company related activities.
- Company materials and equipment must not be used for any unlawful or unethical purposes.
- Employees must pay attention in order to protect the company equipment or material that was entrusted with them from getting lost or stolen.

Employees should also exercise due care for the protection of the company material and equipment from being misused or being seized by an unauthorized person including their family members and friends.

When requested so, employees must return all equipment's and other materials they are provided with to ULUS METAL without delay.

4. At ULUS METAL, We Protect Our Data

4.1. Protection of the Company Data

Our team members may obtain sensitive information regarding ULUS METAL during their time at the company. It is important for the interest of ULUS METAL as well as ULUS METAL team members, that the Confidential Information are kept in confidence. ULUS METAL employees are responsible for ensuring that the sensitive and confidential information are kept confidential.

Our team members should be aware that that along with the company-related confidential information, certain information regarding other team members, customers, suppliers, business partners or consumers should also be kept confidential, whether in written, oral or electronic.

Examples of Confidential Information:

- Information on new products and services, business plans, campaigns and marketing strategies that are not yet shared with public by ULUS METAL;
- Financial and operational information such as pricing and market analysis, financial data, sale targets, sale numbers, product and service fee quotations or product and service costs;
- Operational information such as business partners, organization charts, intercompany position and management changes,
- Information on investors, employees, customers, suppliers and etc.,

Employees who have access to confidential information should be aware of the responsibilities attached to this capacity. ULUS METAL expects all employees to exercise due care for keeping the information confidential. Employees are responsible to learn their duties on the matter.

It is also important to note that any act violating the confidential nature of an information may result in a criminal or other type of liability.



Please use caution

- Confidential Information must only be shared with persons who are authorized to obtain that information.
- In cases where it is necessary to share Confidential Information with persons outside of the company, first a confidentiality agreement should be put in place or necessary precautions and protections specified in the already signed confidentiality agreement should be observed. Legal department should be contacted for information on the confidentiality agreement and other precautions.
- Necessary measures should be taken in order to prevent unauthorized people from accessing confidential information. Documents and accounts containing confidential information should be maintained with due care.
- Employees should ensure the documents containing confidential information are not accessible by their family members and friends.
- At conferences or other organizations where, other companies' employees are present, ULUS METAL employees should not exchange information or enter into discussions regarding sales, operations, organization, pricing, costs, customers, employees and business partners. If somehow those subjects are brought up, one should politely excuse him or herself and the conversation should be politely ended.
- ULUS METAL employees should remember that their responsibilities concerning Confidential Information continues even after they are no longer work at ULUS METAL.

4.2. Protection of Personal Data

Personal data means any information relating to an identified or identifiable natural person. Personal data may be exemplified as any information to identify a person such as his/her name, surname, date of birth, place of birth, physical appearance, information on his/her family, economic and social status, name, phone number, license plate, social

security number, IP number, passport number, CV, photo, visual and audio records, finger prints and genetic data.

The European Data Protection Regulation and Law Numbered 6698 on the Protection of Personal Data (“LPPD”) introduces significant obligations to companies concerning protection of the personal data and imposes severe sanctions against infringers.

ULUS METAL believes that respecting one another’s personal data in the company is the key to a content, peaceful and efficient working environment

It is ULUS METAL’s policy to fully conform with its obligations relating to personal data protection and it fulfills these obligations within the perspective of laws and internal policies.

ULUS METAL employees should also pay strict attention to prevent any potential violation of personal data protection law such as unlawful data leak, access of data by an unauthorized person, data process without consent.



Please use caution

- It is strictly prohibited for our unauthorized employees to access or try to access files and folders containing personal data.
- Our authorized employees must ensure with due care that such files and folders are inaccessible by unauthorized persons.
- Employees should respect one another’s, customers’, business partners’ and suppliers’ personal data and should not try to access information irrelevant to the subject matter work or procedure.
- Employees must not share personal data belonging to another person without his/her consent.
- Employees who have access to personal data must act dutifully and follow up latest legislation on the matter.

It is important to note that employees are obliged to prevent unauthorized third parties from accessing personal data and to avoid any illegal or unconsented data processing even after the end of their employment at ULUS METAL.

4.3. Social Media Policy

ULUS METAL is aware that social media occupies an important place in one's daily life and respects its employees' right to express themselves through social media.

That said, employees should act responsibly while using social media and must not damage company's reputation.



Please use caution

- Employees must not enter into discussions on social media concerning subjects relating to ULUS METAL.
- Employees should not share any information, whether confidential or not, concerning intercompany matters.
- It is strictly forbidden to share any information that could negatively affect company's image and reputation.
- Employees, unless given authority, must refrain from making any statements on social media on behalf of ULUS METAL. Employees should stress that their statements only reflect their own personal ideas if there is any possibility that one might have the impression that the statement comes from ULUS METAL.
- Employees, when they are at ULUS METAL, whether during or outside of working hours, shifts or services, should not be posting on social media.
- It is prohibited to take photos or record videos at the premises of ULUS METAL.
- Employees are not allowed to post on personal social media accounts through e-mails, computers, telephones and similar which are assigned by the company for the work-related purposes or by using company internet connection.
- Employees should not share their location at work and should not post photos from company meetings, trips, banquets and other organizations.

- Identifying yourself as a ULUS METAL employee at social media accounts, aside from “LinkedIn”, is not compatible with company’s professionalism perception.

5. Professionalism at Work Life and Legal Compliance

5.1. Avoiding Conflicts of Interest

ULUS METAL believes that employees should be objective on each step of their decision-making process in order to create a professional work atmosphere with international standards.

Therefore, employees should not let their personal interests influence their decision-making process when deciding on company-related matters.

In cases where an employee's or his/her relative's interest conflicts with ULUS METAL's interests, or where it appears to be so, such conflict falls within the remit of the Guide.

When it is difficult for an employee to make decisions objectively during the course of his/her company-related works, it may be inferred that there is a conflict of interest.

Having a conflict of interest not only jeopardizes ULUS METAL's welfare but also damages your credibility within the company. This is why you should avoid any conflict of interest.



Please use caution

- Ensure that your personal interests align with your professional interests.
- Do not enter or attempt to enter into a business relationship with ULUS METAL's business partners, customers or competitors outside of ULUS METAL.
- When composing your investment portfolio, ULUS METAL's business partners, customers or competitors should be avoided as much as possible. Especially, if your position at ULUS METAL requires for you to make decisions regarding these companies, you should strictly refrain from investing in them.

- If you are not authorized to represent ULUS METAL, you should avoid any statement, act or implications that would suggest otherwise.
- You should refrain from engaging in any relationship that could prevent you from exercising your duties at ULUS METAL. Especially, you should avoid business relationships of such nature.
- Information obtained due to your position at ULUS METAL should never be used to gain any personal or economic interest.
- If you take on a role in a non-profit organization working as a director, a member of advisory committee or working on any other position, you should be cautious when supporting these organizations, financially or by another way, on behalf of ULUS METAL. Relevant units at the company should be well-informed on the matter.
- When it is ambiguous or reflects a hesitant situation, ask yourself: Would I want my family, friends and relatives to learn about this? How will I feel when people I know find out what I am about to do? You may conclude that you should avoid that act if the answers to these questions are unfavorable.
- If you have hesitations regarding a matter of conflict of interest, get in touch with your manager or legal department in order to consult them on how to proceed.

5.2. Respectful Workplace Environment

ULUS METAL, we believe the key to a better workplace is to have everyone in the company treat each other with respect and kindness with the principle of professionalism.

ULUS METAL is aware that it should take a strong initiative concerning employees' relationships with each other in order to provide a healthy and secure work environment that allows its members to advance both morally and materially.

In this regard,

ULUS METAL follows with great seriousness the complaints regarding those who behave in ways that could harm a respectful working environment. ULUS METAL

imposes relevant sanctions on those who behave unprofessionally and may disrupt working peace and order.

ULUS METAL offers a fair working environment by observing absolute qualification-based policy for recruitments, promotions, task allocations, distributions of work, salary raises and disbursing bonuses. Therefore, any potential negative perception among the employees is avoided.

In order to maintain a content and respectful workplace environment, within the perspective of these policies, ULUS METAL believes that the obligations listed, but not limited to, below should be observed.

- Avoiding unpleasant jokes and acts, completely refraining from physical pranks;
- Never using condescending or teasing expressions,
- Not gossiping about managers or employees in the company,
- Not using disturbing or insulting language with one another,
- Not sending any written, audio or visual material on any platform and through any device which contain agitating, disturbing, condescending, offensive for a certain part of society, violent or sexual elements,
- Absolutely avoiding any tune, manner or expression that may be perceived as a threatening.

5.3. “0” Tolerance for Psychological Harassment (Mobbing)

Mobbing means any unfair, systematic and continuing mistreatment by an employer or employee toward a target by directing intimidating, self-confidence staggering, ignoring, psycho-terrorization words or behaviors which damages target’s psychological and physical health.

In recent years, number of white-collar employees suffering from mobbing has increased. Mobbing, not only causes adverse effects on target’s psychology but it also decreases general efficiency in the workplace.

Mobbing gives rise to disputes and conflicts in the workplace both among the employees in general as well as for the victim in particular. As a result, negative outcomes emerge such as disruption of the peace in the workplace, decrease in effectiveness, increase of the error ratio, weakening of employees' commitment to the company and escalation of resignations.

Elements of mobbing may be listed as below:

- Mobbing may be directed from top to bottom, bottom to top or among same level employees.
- The purpose of mobbing may be intimidation, passivation or removal from office.
- Mobbing may seek to damage target's personality, career or health.
- Words or behaviors of mobbing may be both explicit or implicit.

Mobbing affects employees' performances and disturbs order of the workplace.

We define our policy against mobbing as "Zero-Tolerance for Mobbing".

In this respect, ULUS METAL takes every measure against mobbing. ULUS METAL employees must strictly refrain from any aspect that could constitute mobbing.

ACTS TO AVOID BY ULUS METAL EMPLOYEES

In accordance with the "0 Tolerance for Mobbing" policy, ULUS METAL employees must completely avoid the acts categorized below.

1. Acts that Affect Victim's Ability to Demonstrate His/her Skills and Affect His/her Social Communication

- Restricting victim's opportunity to demonstrate his/her skills and prove him/herself
- Frequently interrupting victim's speeches
- Addressing the victim in a harsh and scolding manner repeatedly
- Constant criticism of victim's work, with or without justification
- Continual disturbance of the victim outside of business hours with subjects relevant or irrelevant to work

- Threatening the victim in writing or orally or any other manner.

2. Attack on Victim's Intercompany Social Relationships

- Stopping communication with the victim, entirely or partially.
- Giving the victim a workspace that is remote from the others and isolating him/her
- Disregarding victim's presence

3. Attack on Victim's Reputation

- Spreading false rumors about the victim's and talking unpleasantly behind his/her back
- Insulting victim's physical and psychological state
- Doing impressions of the victim, mimicking how he/she walks, talks, gestures or acts
- Teasing the victim about his/her religion, ethnicity or political views
- Directing sexual or unkind implies toward the victim

4. Attack on Victim's Professional Life

- Not assigning any special tasks to the victim related to his/her profession
- Constantly employing the victim with unqualified assignments
- Continuously tasking the victim with insignificant duties or those which require less qualification than what the victim is equipped with
- Not presenting the victim with self-fulfilling and self-improving opportunities
- Changing victim's tasks at work frequently

5. Assault on Victim's Health

- Forcing the victim to undertake physically heavy duties which are not suitable

- Threatening with physical violence of any sort
- Using violence on the victim, even lightly, in order to frighten
- Causing physical harm to the victim in any manner.

ULUS METAL promises that, in accordance with the Zero-Tolerance on Mobbing Policy, employees who conduct mobbing shall be subjected to administrative, civil and criminal proceedings in the most effective manner.



Combat Against Mobbing

ULUS METAL acknowledges that its ultimate fight against mobbing at workplace cannot succeed without effective cooperation and help of employees. For this reason, employees who are victims of mobbing, or being witness of any mobbing action, shall fulfill their obligations stated below.

- Employees shall not, under any circumstances, remain silent if witnessed to mobbing.
- If an employee reckons that he/she or any of his/her colleagues have been a victim of mobbing, they shall promptly notify it through e-mail at sikayet@ulusmetal.com.tr (Turkey) or zgloszenie@ulusmetal.com.pl (Poland) or directly notify ULUS METAL Human Resources Department or the Legal Department.
- Managers shall not, under any circumstances, tolerate any conduct or action of mobbing or alike between the employees.
- Managers shall carefully observe the relationship between the employees under their responsibility and protection and identify employees who suffer from mobbing followed by an immediate notification to the relevant departments.

5.4. Policy on Fighting with Discrimination

Discrimination is prohibited by many laws and international agreements including the International Labor Organization (“ILO”) Convention No. 111, the International Convention on the Elimination of All Forms of Racial Discrimination of 13 October 1972, the European Convention for the Protection of Human Rights and Fundamental Freedoms, the European Social Charter and the Convention on the Elimination of All Forms of Discrimination against Women.

Discrimination, in its widest scope, reflects situations in which individuals who possess same qualifications are treated differently. That said, discrimination can be categorized under three main scenarios;

1. Direct Discrimination means treatment of an individual in a less favorable or negative way based on any qualifications or features that such person possesses. In this context, direct discrimination is different treatment of individuals, who are categorized somehow, without any justifiable or objective reason, alternatively creating a steep disproportionality between targeted purpose and reality.
2. Indirect Discrimination reflects an atmosphere in which treatment of an individual or a group suggests an objective approach at first sight, but in reality, implementation of a condition, criteria or application creates a disadvantaged situation for an individual or a group. For instance, not designing the work premises in a manner enabling persons in wheelchair access the building even where there is no direct prohibiting or restricting rule, or discriminating against women by introducing irrelevant requirements during recruitments as to age or seniority are considered indirect discrimination.
3. Invisible Discrimination is often experienced by women at the workplace, which may relate to discrimination as to wages, working conditions, approaches at

workplace, promotions, termination of employment contracts, access to production resources or insufficient division of domestic responsibilities etc.

In this respect, ULUS METAL guarantees that any direct, indirect or invisible discrimination towards employees shall not take place and takes all necessary measures to prevent such to take place between ULUS METAL' employees.

In this vein, it is strictly forbidden for ULUS METAL employees to make any inappropriate comments or to insult one another or third persons as well as to make discrimination of any kind, directly, indirectly or invisibly, based solely upon below mentioned reasons.

- Race
- Age
- Gender
- Physical attributes
- Sexual orientation
- Sexual activities within legal limits
- Criminal situation or past
- Medical situation or past
- Civil or familial situation
- Relationship situation
- Political preferences, tendencies or relationships
- Religious preferences, tendencies or relationships
- State of pregnancy or breastfeeding situation

In addition, ULUS METAL does not discriminate directly or indirectly in any way during the recruitment processes, including the issues mentioned above, and evaluates based on completely objective and objective criteria. ULUS METAL supports the employment of minorities and disadvantaged groups in society and fulfills its duty in this regard.

ULUS METAL does not employ child labor or employ people under the age of 18. The only exception to this situation is students and young employees who are in the legal internship period.

ULUS METAL guarantees that all available measures shall be implemented against any direct, indirect or invisible discrimination.

5.5. Policy on Sexual Harassment

Sexual harassment is the act of disturbing the victim sexually, contrary to general moral principles and acceptance, which can occur through verbal abuse, physical contact, or other forms of sexual behavior.

Exposure to non-consensual sexual behavior and violence may not only hamper one's work life but it may also harm victim's psychological and physical health and cause traumatic effects.

At workplaces where a subordination is based on hierarchy, it is observed that victims of sexual harassment experience hard time to come forward. For this reason, sexual harassment cases are mostly not identified, therefore, both the victim and the institution are respectively being injured.

It is in this perspective that, ULUS METAL guarantees that sexual harassment shall not be tolerated under any circumstances.

ULUS METAL guarantees that in case an offence of sexual harassment occurs, it shall closely follow the incident by implementing internal disciplinary mechanism, as well as cooperating with competent institutions and judicial organs with regards to administrative, civil and criminal matters.

It is strictly forbidden for ULUS METAL employees to conduct or display any action or behavior which is or may be interpreted as harassment by the counterparty or victim.



Actions to Avoid

It is within above explained context that, ULUS METAL employees shall not:

- Exhibit any verbal, physical or sexual behavior or action that is not approved by the counterparty;
- In a non-excusable manner; make any physical contact, create eye-contact or make gestures and facial expressions with the counterparty;
- Make any sort of direct or indirect statements or references concerning job title, promotion status or sexual relation with other employees of an employee,
- Share, exhibit or transmit any sort of graphic, comics, painting, photo, article, story, joke or implied references on social media posts or in any other platform which may contain any element of obscenity or discrimination concerning one's race, gender, nationality, sexual orientation, religion, disability or any other personal specifications.
- Initiate, attempt to initiate or act in a manner that may be perceived as an intention to initiate any sort of emotional or physical relation with a superior official, even

if working at different departments, which exceeds boundaries of a normal working relationship, thus may result in a more favorable treatment of the relevant employee;

- Impose restrictions, intervention or intimidation against an employee, as a retaliation, because the latter, in good faith, receives counselling concerning a sexual harassment case, makes a sexual harassment complaint or takes part in a legal proceeding of sexual assault or harassment as a witness.

ULUS METAL strongly urges employees who have unfortunately been subjected to any sort of sexual harassment to come forward by reporting case to their managers and legal department. Moreover, ULUS METAL also requests kind cooperation of those who have witnessed to make necessary reporting to their superiors and legal department. Having said that, ULUS METAL guarantees that all necessary measures have been taken in order to ensure aforesaid.

5.6. Policy on Full Legal Compliance in Working Life

As ULUS METAL, we are aware that complying with working life rules contributes to the workplace peace and a productive working environment. For this reason, ULUS METAL complies with the minimum working conditions determined by current laws and agreements in the working life.

Working hours are organized by ULUS METAL in accordance with legal requirements, including rest breaks and recesses. Legal and contractual obligations are fully complied with in terms of weekly distribution of working days, weekly rest periods, national and general holiday periods and annual leaves.

ULUS METAL completes payroll transactions by meticulously tracking overtime within the legally prescribed rules. ULUS METAL pays its employees' wages in full and on time.

As ULUS METAL family, we are aware of the importance of freedom of association and collective bargaining within legal grounds for our employees. Negative attitudes are not taken against formations within this scope and necessary support is provided.

5.7. Policy on Full Compliance with Trade Rules

As Ulus Metal, we follow a policy of full compliance with domestic and international trade rules. In this context, as ULUS METAL, we fully comply with local and international restrictions on import and export.

In this context, our employees are required to operate in accordance with all trade rules in force.

6. ULUS METAL Complaint Mechanism

As ULUS METAL, we are aware of the importance of conveying any negativities that may occur within the company to authorized persons and units without any reservations. In this context, we encourage our employees to report any issue that may be subject to complaint by running the complaint mechanism and ensuring that the necessary actions are taken. In this way, it is ensured that the complaints of our employees and stakeholders are resolved and the necessary steps are taken for the solution.

Subject of the complaint may involve:

- Violations of any applicable law and other legislative provisions,
- Violations of this Guide or other ULUS METAL company rules,
- Violations of contracts concluded with ULUS METAL or ULUS METAL company principles,
- Behaviors or events that may disturb any person or group of people within ULUS METAL,

ULUS METAL evaluates the complaints in a transparent, impartial and confidential manner, investigates them in the most effective way, reaches a conclusion as soon as possible and provides feedback to the relevant person(s).

ULUS METAL undertakes that the identity and information of the person complaining will be protected, and that no action will be taken against him or any other type of pressure will not be applied due to the complaint.

Our employees or other stakeholders can send their complaints and any other problems to the e-mail address below. Complaints sent to these addresses will be evaluated within the principles and standards stated above.

sikayet@ulusmetal.com.tr (Turkey) or
zloszenie@ulusmetal.com.pl (Poland)

7. Making Right Decisions at the Right Time

In order to devise the right solution at the right time for the problems that are confronted during business life, one needs to “stop, evaluate the situation and apply the rules in this Guide”.

The right decision-making process starts with asking the right questions. The diagram below is designed to help you make the right decision. If the answers to the questions do not correspond to the responses in the diagram, you are advised not to proceed with the decision.

Please contact your supervisor or ULUS METAL legal department to ask for help at any hesitation.

6. Making Right Decisions at the Right Time

