



ENKA
Engineering for a Better Future

CODE OF BUSINESS CONDUCT





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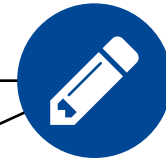
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Our Vision

To be one of the best and innovative engineering and construction companies serving globally.



Our Values

Behind every activity and project undertaken by ENKA, there are its corporate values which determine the way of doing business, support the business culture and vision and are adopted by all ENKA employees.

Trust: An open relationship with our employees based on mutual trust, respect and success.

Commitment: Uncompromising commitment to quality, health, safety and environment.

Solidarity: Sharing success and standing together in the face of failure.

Inclusivity: Involving stakeholders in our processes and decision-making mechanisms, not excluding any stakeholders on the grounds of discrimination or prejudice.

Integrity: Acting in compliance with relevant laws, regulations and internationally accepted ethical values in all of our operations without exception.

Innovative Acumen: Excellence, innovation and improvement are our priorities.

Stewardship: Being aware of our responsibility throughout the management of all stages of our activities and fulfilling all requirements of this responsibility through the life span, including social, environmental and economic aspects.

Sustainability: A corporate sustainability approach that imparts awareness of economic, environmental and social responsibilities towards internal and external stakeholders.

Transparency: Adopting an explicit attitude regarding our decisions and activities that affect the environment, society and economy and ensuring honest and clear communication with stakeholders.



Our Mission

To design, build and deliver safe, high-quality and cost-effective construction projects on schedule for our customers while providing quality employment and career growth opportunities for ENKA employees.





About Our Rules

Section 1

About Our Rules

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1.1. What is ENKA's Code of Business Conduct?

Code of Business Conduct is a manifestation of ENKA's commitment to carry out its operations worldwide to the highest of standards of business ethics. ENKA Code of Business Conduct is based on the corporate values of the company, as well as the relevant legislation governing the company's operations. The Code is designed to guide employees in recognizing and resolving potential ethical and compliance issues that may arise in their daily activities. These rules contain general information and applicable recommendations on the behavior expected from ENKA employees both during and off the work.

It should be noted that this document may not cover every potential situation that ENKA employees may encounter. Employees are encouraged to report any ethics and compliance concerns or questions they may have. If there is an issue that employees are concerned about, employees are requested to first consult their line managers or senior managers, the Ethics Hotline or the Corporate Sustainability and Compliance Department.

Please contact the Corporate Sustainability and Compliance Department or e-mail to ethics@enka.com for any questions relating to the Code.

1.2. Why is there a Code?

ENKA's success is proportional to its reputation for ethical business performance. For this reason, ENKA has adopted global standards to conduct its business fairly and honestly, and interact ethically with its employees, clients, suppliers, competitors, governments and communities. The Code describes our global standards and helps that the principles and rules governing the way of doing business at ENKA are understood.

The Code of Business Conduct helps to:

- Adopt an honest and ethical attitude, and ensure that the right decisions are made,
- Protect and maintain the corporate culture and values,
- Understand what ENKA expects from its employees,
- Ensure that work is carried out in accordance with all of the laws, regulations and standards applicable to ENKA,
- Ensure employees receive guidance and understand what to do when they need support.

1.3. Who must follow the Code?

The Code of Business Conduct applies to all employees, business partners, subcontractors, consultants, representatives and their employees around the world, including the boards of directors of ENKA and its subsidiaries. ENKA demands its all cooperating parties to act in accordance with the Code of Business Conduct.

1.4. What is expected from an ENKA employee?

In addition to complying with the Code of Business Conduct, the expectations from an ENKA employee are listed below:

- Know, understand and implement the requirements of the laws and regulations that are relevant to the responsibilities of their job,
- Promote and represent ENKA in the best possible manner, in line with the values and the mission for which it stands,
- Complete the assigned ENKA Code of Business Conduct training and re-read the Code every year,
- Know, understand and implement ENKA's Health, Safety and Environment, Quality and Sustainability policies, and all related procedures,
- Understand the risks associated with the job and how to manage them, and to seek guidance from the relevant units or persons when in doubt,
- Ensure that all our cooperating third-party companies and individuals are aware of their duty to comply with this Code,
- Report any suspected violations of the Code through the appropriate communication channels,
- Collaborate in investigations of possible Code violations.

About Our Rules

1.5. What is expected from managers?

Managers are responsible for fostering a culture of ethics and compliance, ensuring people are treated with respect in a positive work environment. In addition to leading the implementation of the company's Sustainability, Ethics & Compliance, Health, Safety and Environment and Quality principles and processes, managers have additional responsibilities regarding the Code as outlined below.

- Setting a good example by always following the Code, relevant policies and procedures.
- Emphasizing the importance of participation in the relevant training and certifications, while helping employees and other stakeholders (business partners, subcontractors, etc.) to understand the relevant rules, policies and practices.
- Ensuring that employees allocate the necessary time for the prompt completion of their assigned Ethics and Compliance training.
- Encouraging employees to raise their questions and concerns.
- Informing new recruits about the Code and advising them where they can obtain advice and support.
- Keeping a close track of any known or suspected misconduct, informing relevant departments where needed and taking the necessary actions.
- Supporting employees who raise concerns or report potential problems in good faith, even if it is outside their managerial area.

- Never retaliating or allowing retaliation in any way against those who assists with an investigation or raise concerns in good faith. Reporting to the Corporate Sustainability and Compliance Department or the Ethics Hotline when informed of a potential violation of the Code. During this process, ensuring the confidentiality of matters reported is protected against other employees. Not personally undertaking the investigation of a raised concern.

- Ensuring appropriate and respectful working conditions and a fair distribution of tasks among their teams; not taking advantage of employees for the fulfillment of personal tasks.

- Ensuring effective communication and encouraging questioning attitude among their teams.

1.6. What is expected from business partners?

Suppliers, subcontractors, consultants, representatives and other third parties (stakeholders) are expected to act in compliance with ENKA Code of Business Conduct and the Supplier Code of Conduct. The current versions of the Code of Business Conduct and the Supplier Code of Conduct are available at:

<https://www.enka.com/sustainability/home/ethics-compliance/>

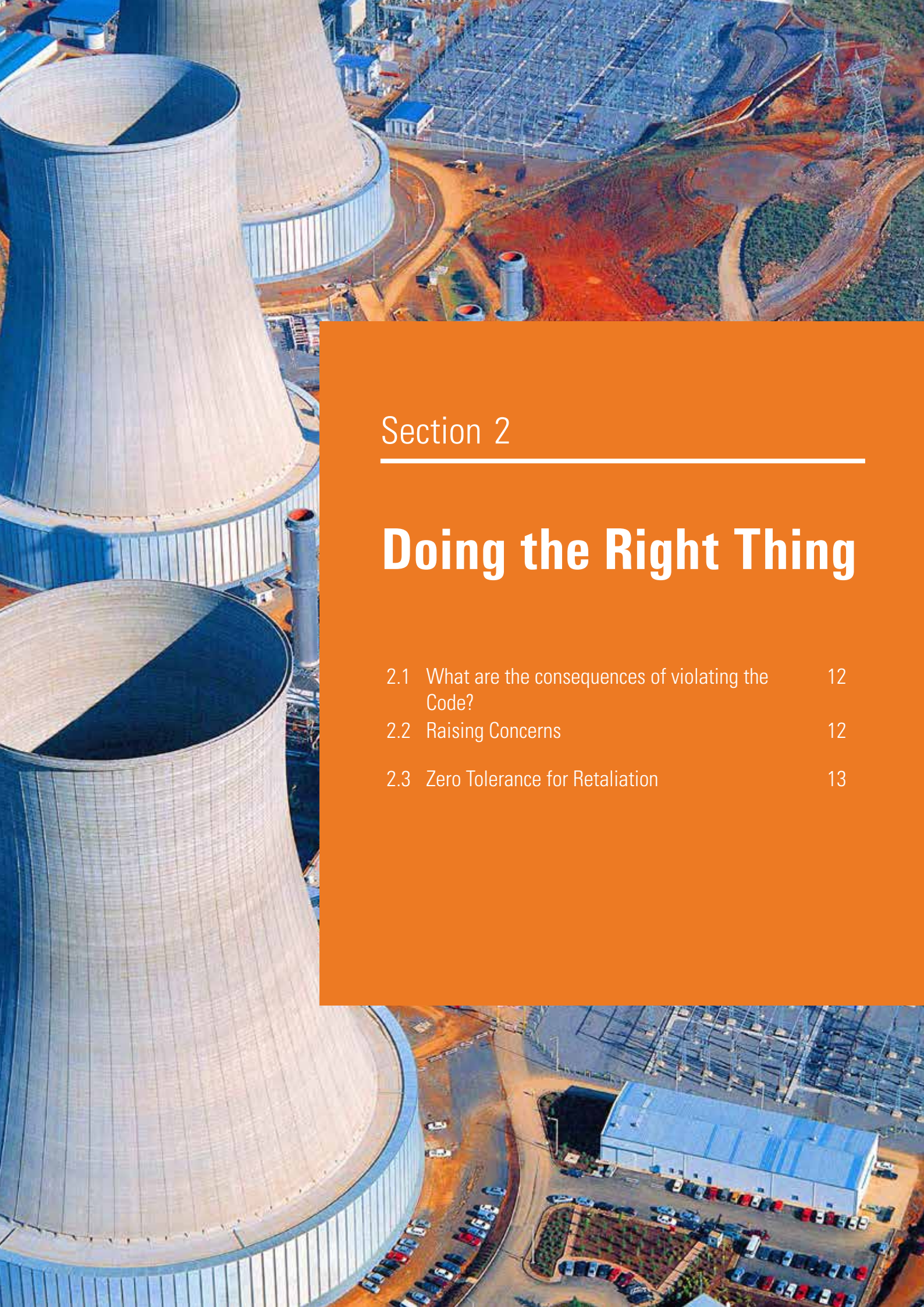


1.7. What if local laws, regulations and customs are contradictory?

ENKA and its group companies operate worldwide and the local laws and regulations in the countries in which it operates may sometimes contradict the Code. ENKA recognizes and respects the relevant laws, regulations, legislation and customs of all the countries in which it operates. However, behaviors contrary to the universal business ethics are to be avoided by not accepting practices that contradict or conflict with the universal business ethics rules and ENKA Code of Business Conduct, which was regulated in accordance with these rules, and in such cases, ENKA Legal Department is to be consulted.

The strictest standards are to be applied when a discrepancy between the Code and the local legal requirements in effect is identified.





Doing the Right Thing

Section 2

Doing the Right Thing

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2.1. What are the consequences of violating the Code?

Compliance with the ENKA Code of Business Conduct and the relevant laws is mandatory and compliance in this regard is closely audited and monitored. Violations of the Code and the related policies can result in disciplinary action, up to and including termination of employment. Where necessary, ENKA may report a violation to the authorities, which may result in legal action, as well as fines or imprisonment, for those involved.

In addition to those who approve and encourage behaviors and actions that are contrary to the rules, those who do not report possible violations when aware of the situation, or who retaliate against employees who make a report, may also face disciplinary action. Detailed information on the relevant disciplinary actions can be found in the Disciplinary Action Procedure (TR000-000-HR-PRO-00012).

An employee may not always be sure what is the right thing to do in some situations. In such cases, employees are first expected to make an assessment by asking themselves the following questions:

- Am I adhering to ENKA's core corporate values with this behavior?
- Is my behavior legal, and do I have the required authority to do so?
- Is my behavior ethical and in line with ENKA Code of Business Conduct, as well as the company policies and procedures?

- Am I protecting the reputation of the company?
- Do I fully understand the risks that may arise as a result of my actions?
- If my colleagues, family and friends were aware of my behavior, would I still think I am doing the right thing?
- Can I comfortably defend the situation in question to the company management, including the senior management?
- Am I ready to take responsibility for my actions?

If the answer to at least one of these questions is no, or if there is any hesitation in answering, the employee should request support by contacting his/her manager, senior manager, the Corporate Sustainability and Compliance Department or the Ethics Hotline.

Any employee can make a wrong decision or make a mistake. When employees make a wrong decision or act in an inappropriate way, rather than trying to covering it up, they must take the issue up with their managers or report it through the ethics communication channels. Considering that even a small mistake can have serious consequences, it is extremely important to notify ENKA and allow time for the necessary actions to be taken.

2.2. Raising Concerns

It is the responsibility of all employees to report any witnessed, known or suspected violations of the Code and ENKA's policies including but not limited to Sustainability, HSE, Quality, Information Security and Nuclear Safety. Reporting a concern, violation or potential violation allows ENKA to detect and prevent potential or current situations. Failure of ENKA employees to notify in such cases puts the reputation of ENKA at risk, while also increasing the risk of facing financial and legal consequences for ENKA.

In the operations carried out with suppliers, subcontractors or business partners, employees are required to report any violations of the Code that they may observe.

ENKA respects confidentiality and so reports can be made anonymously if desired, and in the Turkish, English, Russian and Kazakh languages. The use of any information shared in such reports is limited on a "need-to-know" basis and used only for investigation of the report.

ENKA has established various communication channels through which employees can raise their concerns or seek guidance. Any concerns may be raised by an employee through direct verbal communication or in writing. It is recommended that employees first share their concerns with their manager or a senior manager. In cases where this is not sufficient, they may convey their concerns to the ENKA Ethics Hotline or e-mail address, to Corporate Sustainability and Compliance Department, or directly to the members of the Executive Ethics and Compliance Committee.

Doing the Right Thing

All communication with the Ethics Hotline (phone or e-mail) is classified, and is reported to the Executive Ethics and Compliance Committee. Any reports that fall within the execution area of the Ethics Hotline are assessed, investigated, concluded and complainant is informed. These communication channels are accessible to the employees of ENKA and its subsidiaries, to other companies with whom it has business relations and their employees and to all other stakeholders.

Detailed information on the Ethics and Compliance Committee can be found at the link below or within the Executive Ethics and Compliance Committee Procedure (TR000-000-CR-PRO-00004) among the ENKA Corporate Procedures.



<https://www.enka.com/sustainability/home/ethics-compliance/executive-ethics-compliance-committee/>

Employees of ENKA and its subsidiaries are required to contribute in an honest and open manner when asked to participate in an internal investigation. Under certain circumstances and in accordance with the relevant laws, ENKA may access, examine and share with the necessary parties any information processed or stored on company equipment, hardware and computers within the scope of an investigation.

Details regarding the investigation of the reports made can be found in the Reporting Mechanisms and Internal Investigations Procedure (TR000-000-CR-PRO-00002).

2.3. Zero Tolerance for Retaliation

Any kind of retaliation against persons who report in good faith, who raise their concerns, who seek for support in a situation where they are in a dilemma, who cooperate in ongoing investigations and audits, and who refuse to participate in suspicious, inappropriate or unfair activities, will never be tolerated by ENKA and no company sanctions shall be raised against such employees. Any threats of retaliation against an ENKA employee is a serious violation of the ENKA Code of Business Conduct.

ENKA Ethics Hotline Telephone Number:



+90 (212) 376 10 10

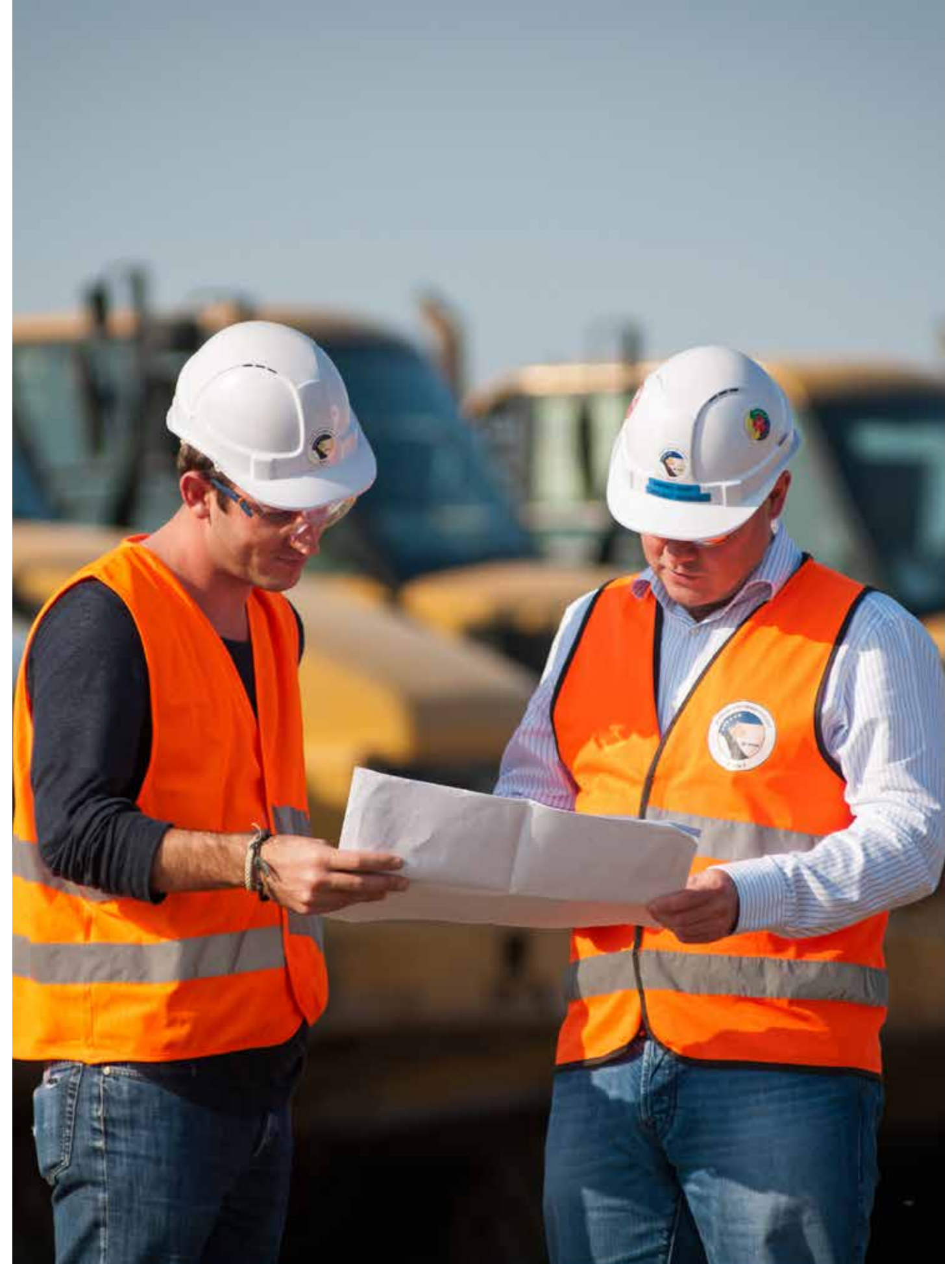
ENKA Ethics E-mail Address:



ethics@enka.com

The ENKA Ethics Hotline is accessible from Monday to Friday between **09:00** and **18:00**.

Reports can be made anonymously if desired and in the **Turkish, English, Russian** and **Kazakh** languages.





Section 3

Respecting Human Rights

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Respecting Human Rights

ENKA is aware of its responsibility to respect human rights, and believes that it can play a positive role in the societies in which it operates. To this end, ENKA's conduct in its global operations is in line with the purpose of the sections of the United Nations Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration of Fundamental Principles and Rights at Work, which concern the business world and other relevant international principles, including the Voluntary Principles on Security and Human Rights, in addition to the principles of the United Nations (UN) Global Compact, of which it is a signatory. In terms of Human Rights, ENKA takes into account also OECD Guidelines for Multinational Companies and the UN Guiding Principles on Business and Human Rights.

ENKA's corporate policies and procedures, administrative processes, community engagement programs and participation in voluntary initiatives are meant to complement each other, and support ENKA's commitment to respect human rights. ENKA's policies, including its Sustainability Policy, ENKA Code of Business Conduct and ENKA Supplier Code of Conduct, are designed to outline ENKA's human rights policy and to manage associated risks.

ENKA takes due care to identify and eliminate any human rights risks that people involved in its operations and value chain may face. All operations and investments of ENKA are assessed for compliance with human rights. These assessments identify human rights-related risks, and efforts are made to eliminate, reduce or keep these risks under control. When ENKA identifies negative

human rights impacts resulting from or caused by its activities, it is committed to providing the necessary solutions or cooperating to compensate for these impacts fairly. ENKA strives to support resolution in cases where it is related to or involved in such adverse effects through its relationships with third parties.

3.1. Avoiding Child Labor, Forced Labor and Human Trafficking

ENKA maintains a policy of zero tolerance for child labor, human trafficking, forced and compulsory labor, modern slavery, unregistered/illegal labor and prostitution. Child labor and forced labor are strictly prohibited across the entire value chain, including the operations of ENKA and its subsidiaries, and the activities of cooperating suppliers and subcontractors, and these companies are subjected to pre-assessments and audits in this context.

ENKA employees are required to understand the laws and risks related to any child labor, forced labor and human trafficking that they may encounter during their work and to strive to ensure that ENKA does not work with suppliers, subcontractors or other business partners engaged in such activities, and to report their complaints in this regard.

Candidate employees of ENKA and its group companies are never charged any fees in any phase of the recruitment process. Employees' travel or identity documents or other personal belongings are never confiscated to restrict their freedom of movement.

ENKA complies with the relevant laws and reporting requirements of the countries in which it operates.*

3.2. Diversity and Inclusion

ENKA's workforce consists of talented professional teams from all over the world who are committed to achieving the perfect results for all stakeholders. ENKA's goal is to benefit from its diverse workforce by leveraging the knowledge and talents of each individual and to strengthen and develop them while promoting diversity, inclusion, variety, intercultural understanding and collaboration. To this end, all ENKA employees are required to show dignity and respect for all ENKA employees, and to place value in the diverse backgrounds, experiences and ideas of their colleagues and employees in all locations in which ENKA operates. Employees are also expected to respect cultural differences at all times, to promote an inclusive work environment, and to act in an appropriate and fair manner towards subcontractors, customers and members of the local community.

ENKA employees are expected to be objective when making business decisions, and to ensure that their personal views, prejudices or preferences do not affect their business or employment decisions. Verbal or written statements that may be perceived as discriminatory, offensive or insulting at work or during job-related interviews are to be avoided.

ENKA's diversity and inclusion policy, like the rest of the Code of Business Conduct, applies to all levels of ENKA and its subsidiaries, including the Board of Directors.

Statements on gender, age, origin, cultural features, religion or political opinion, even if it was meant to be a joke, may be interpreted as insulting or discriminatory, and a violation of the Code; therefore they should be avoided in conversations or e-mails.

* ENKA complies with the UK Modern Slavery Act 2015 and publishes its statement accordingly. https://www.enka.com/allfiles/pdf/ENKA_Modern_Slavery_Statement-2020_ENG.pdf

Respecting Human Rights

3.3. Harassment-Free Workplace

Harassment and abuse of any form has no place at ENKA and such violations are never tolerated by ENKA. Harassment can take many forms, including verbal expressions, physical approach or visual exposure and acts that are offensive, damaging to reputation and discriminatory are all considered within this scope. All types of sexual harassment are also included in this scope.

ENKA does not tolerate any form of physical, sexual, racist, psychological or verbal abuse, inappropriate or humiliating jokes or discourses, physical or verbal violence, or any mobbing attempts. Feedback, objections and criticism should always be made in an appropriate and respectful manner. ENKA employees are expected to act with due consideration of cultural differences and sensitivities in all their communications.

3.4. Fair Employment Practices

ENKA regards its employees as the source of its success and applies global standards to provide a working environment in which equal opportunities are provided for its employees, and in which everyone is treated with respect and fairness. All employment decisions, such as hiring, promotion, salary, termination of employment, training opportunities and assignments, are made solely based on factors such as qualifications, performance, merit and experience and while making these decisions, discrimination regarding gender, race, skin color, language, religion, nationality, age,

marital status, social and economic status, union membership, ethnic origin, disability, pregnancy, sexual orientation, political opinion, etc. is strictly forbidden, with the principle of equality kept in mind at all times.

All ENKA employees are expected to act in accordance with the fair employment policy of ENKA when making decisions that will affect employment processes.

All practices related to working hours, conditions and wages at ENKA are carried out in accordance with the applicable labor and working laws of the relevant country and in accordance with the terms of the applicable collective labor agreements, if any. Fair remuneration, in line with the principle of equal pay for equal work, is ensured independent of all discriminatory factors including gender.

3.5. Freedom of Association and Collective Bargaining

ENKA respects its employees' right to form, join or not to join a labor union, without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, ENKA is ready to engage in a constructive dialogue with their freely chosen representatives. ENKA is committed to engage in good faith with such representatives based on this understanding.

3.6. Healthy and Safe Workplace

The safety and health of employees are of utmost importance to ENKA. ENKA's policy is to comply with the requirements of international standards in addition to providing safe and healthy workplaces and full implementation of applicable safety and health laws and regulations, including nuclear safety. ENKA works to provide and maintain a safe, healthy and productive workplace, in consultation with its employees, by addressing and remediating existing risks of accidents, injury and health impacts.

ENKA protects all of its employees and assets, and ensures safe environments in which its operations are carried out. ENKA regulations and administrative processes have been established to ensure security in all its fields of activity and they are in line with the Voluntary Principles on Security and Human Rights. Security requirements across ENKA help to keep employees, subcontractors and facilities safe in such a way that respects human rights and the safety of the local communities.

Employees are prohibited from working under the influence of alcohol, any kinds of drugs, or any medication, whether illegal or prescription in any way that may affect their ability to perform their work safely and effectively; and from having such substances in possession. All employees must strictly abide by the rules regarding drugs, medication and alcohol in effect for the workplaces within ENKA so as to avoid compromising the safety of both themselves and their coworkers.

3.7. Protection of Personal Information and Privacy

At ENKA the privacy of employees and business partners is respected, and care is taken to preserve their personal data and maintain confidentiality. Data pertaining to employees and business partners is only processed within the confines of the law to develop the company's activities.

Employees with responsibilities and duties for the processing of personal data are under obligation to abide, first and foremost, by the legislation on the protection of personal data and to:

- Act in accordance with ENKA's corporate policies,
- Process such data in a limited and measured manner and solely for legitimate purposes,
- Process the data in conformity with the law and the principle of honesty,
- Process the data only for the period envisaged by law,
- Make sure that the assent of the persons concerned has been obtained in cases where this is required by law,
- Adhere to the corporate inventory when processing data,
- Inform his or her supervisor and the Personal Data Protection Committee when processing any item of data not in the inventory and ensure that such item is reflected in the inventory,
- Provide all necessary explanations to the persons concerned,
- Correct erroneous information when so requested by the persons concerned or by ENKA,
- Keep personal data up to date,
- Limit access to personal data and keep the data confidential and secure,

- Share the data only with the receiver groups and in accordance with the purposes stated in the inventory,
- Not reveal personal data to unauthorized third persons.

Employees must inform the heads of their departments / units and the ENKA Personal Data Protection Committee immediately in the event of a failure to protect any item of personal information, or should personal data be processed in a manner contrary to ENKA policies and procedures, legislation or the Personal Data Processing Inventory, or should a laptop computer, mobile device, printed document or item of equipment containing the employees' information database be lost or stolen or become known to another person.

3.8. Social Community Engagement

ENKA views the communities in which it operates as important stakeholders, and as a responsible corporate citizen, it takes due care to leave a positive legacy for such communities, and to ensure good social performance. ENKA employees are also expected to act in such a way that this responsible corporate approach is supported. ENKA pays utmost attention to maintaining the following in its operations:

- A better understanding of the range of stakeholders covered by the operation, their perceptions of the operation and how they relate to each other,
- A better understanding of the positive and negative impacts of the operation, and ensuring the improved management of both,
- A more effective risk management,
- A better understanding by local stakeholders of the contribution of the operation to the local community, and the possible effects that may arise from the activity,

- Establishing a structured plan and performance indicators to ensure forward-looking engagement with local communities, the appropriate management of impacts and making contributions to sustainable social and economic development,
- Leaving a positive legacy.

In their interactions with local communities, ENKA employees are required to comply with the legislation of the country in question, ENKA Code of Business Conduct and other supporting policies and procedures, in particular ENKA Sustainability Policy and the Social Community Engagement Manual.

3.9. Relations with Suppliers

ENKA encourages its suppliers (here, the term "suppliers" refers to suppliers, subcontractors, consultants, service providers, and representatives of ENKA and its subsidiaries), to approach their employees and the communities in which they operate, with respect for human rights and to comply with the ENKA Code of Business Conduct and the ENKA Supplier Code of Conduct. In addition to requiring its key suppliers to comply with all applicable national laws, ENKA also encourages them to act in line with the basic working principles of the ILO and the requirements of the UN Global Compact. In addition, ENKA contributes to raising awareness of potential human rights issues through its interactions with key suppliers.



Standards of Conduct

Section 4

Standards of Conduct

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4.1. Occupational Health and Safety

ENKA prioritizes the health and safety of its employees, business partners, subcontractors, suppliers, customers and the communities in which it operates. Accordingly, it is committed to providing healthy and safe working conditions for its employees, as well as achieving and maintaining its “Zero Accident” target. In order to maintain this commitment, ENKA demands all its employees and the parties with which it conducts business to understand and implement ENKA’s occupational health and safety standards, along with all relevant occupational health and safety laws and regulations, including nuclear safety. It is the responsibility of all ENKA employees to know and follow both ENKA’s and global and local occupational health and safety regulations, policies, principles and practices, emergency processes related to their work and to maintain the safe working environment provided by ENKA. It is also the responsibility of all ENKA employees to maintain and improve the nuclear safety culture established by ENKA.

Anyone working at or visiting ENKA and its subsidiaries has authority to “Stop Work”. Any work that has the potential to harm employees, the environment or the community must be stopped. It is strictly prohibited to impose any sanctions on employees who use this authority, as is clearly defined in the procedures. ENKA employees are required to report any violation of HSE principles or potential damages, accidents or injuries, without any delay.

4.2. Sustainability

ENKA works to continuously develop and expand sustainability, which it considers as a management strategy based on environmental sustainability, social responsibility and a transparent, inclusive and responsible governance approach, within all of the sectors and regions in which it operates. In this context, ENKA considers sustainability to be a key factor in its responsibility towards its employees, customers, business partners, nature and its host communities and so it strives to increase the positive impacts of its activities and to avoid or eliminate potential negative impacts.

In line with its Sustainability Policy, ENKA works to protect the environment and natural resources, to fulfill its responsibilities in fighting against climate change, to support the social and economic development of local communities and create long-term values, and to contribute the welfare and development of its employees, while at the same time acting as a solution partner in the sustainability journeys of its customers. All ENKA employees are required to comply with ENKA’s Sustainability Policy and related procedures throughout their work and to contribute to ENKA’s sustainability initiatives.

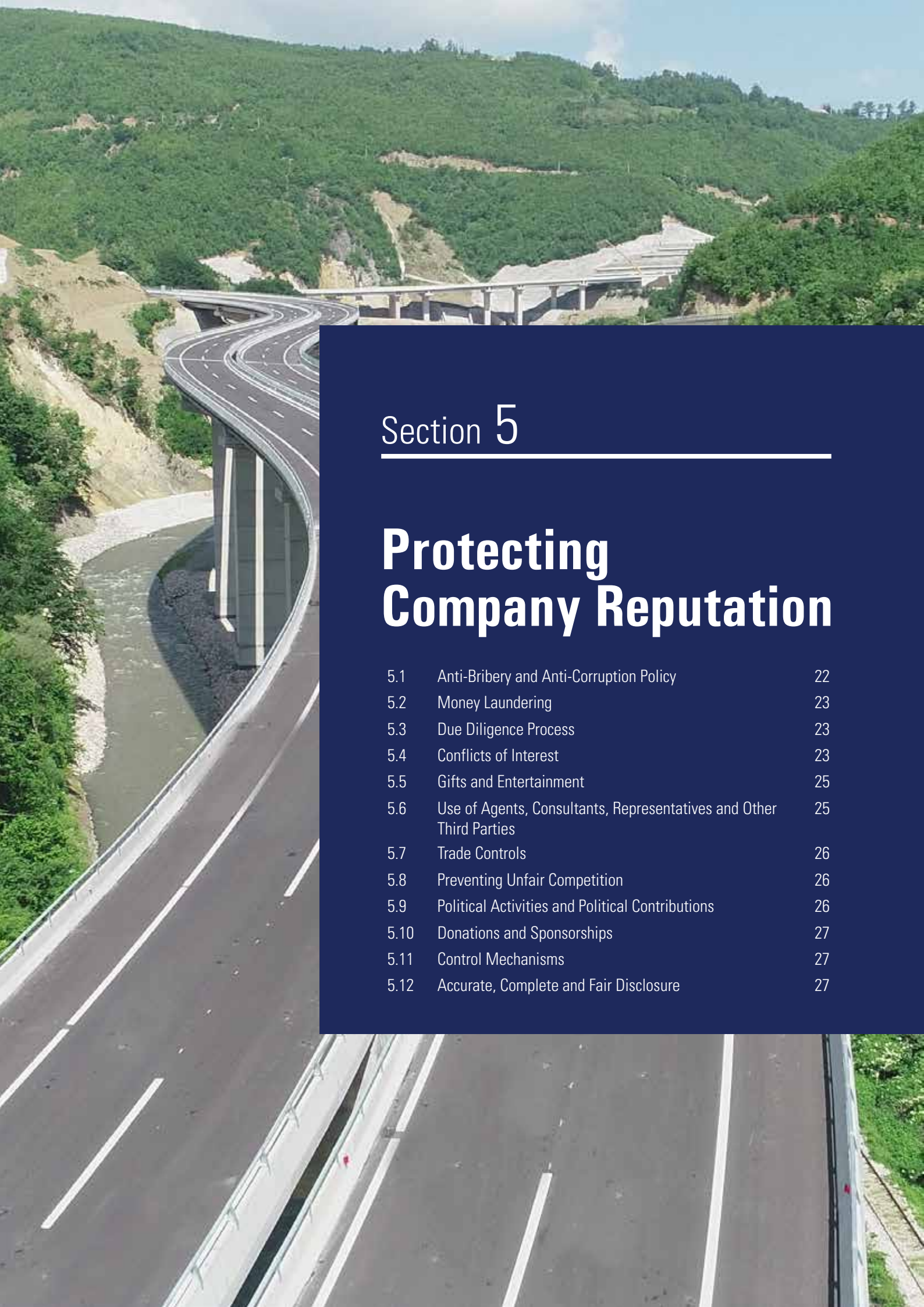
4.3. Commitment to Quality

ENKA always strives to achieve the highest possible quality. While company-wide adherence to the most up-to-date trends in engineering and management ensures the highest quality at all times, ENKA’s corporate management systems are based on internationally recognized standards. In line with ENKA’s quality objectives, all employees are required to comply with the relevant laws and regulations, standards and contractual requirements, as well as ENKA’s established management systems and corporate policies and procedures and to work to increase customer satisfaction and continuously improve the business processes.

4.4. Environmental and Social Performance

ENKA works to increase its positive effects on the environment and society in all of the regions in which it operates and to avoid, eliminate, reduce or compensate for any potential negative impacts. For this purpose, environmental and social impacts of all projects are evaluated prior to its operations, and the necessary plans and procedures for the management of potential impacts are developed and put in place.

All ENKA employees and the suppliers, subcontractors and other business partners with which it is engaged, are required to comply with ENKA’s policies and procedures related to environmental and social requirements, as well as all relevant legal requirements and any other contractual obligations in this regard.



Section 5

Protecting Company Reputation

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Protecting Company Reputation

5.1. Anti-Bribery and Anti-Corruption Policy

A “bribe” is an offer or promise to give, or the giving of, or the authorization to give, anything of value, including money, gifts or other advantages to improperly influence the actions or decisions to be taken on a matter at their discretion of a local or foreign public official or public or person/legal entity. All forms of bribery and corruption are prohibited at ENKA and ENKA has adopted the “Zero Tolerance” for bribery and corruption principle. ENKA is committed to complying with all national and international laws regarding bribery and corruption. Accordingly, ENKA does not allow facilitating payments (a payment made to an official to secure or expedite the performance of a routine job) except in extraordinary circumstances in which the safety or health of employees or the community is at risk. Employees who encounter such situations shall report it and keep the necessary accounting records.

ENKA prohibits bribery in all business relationships with both public institutions and the private sector in its operations around the world. Employees are thus responsible for being aware of and complying with local and other applicable anti-corruption laws associated with their duties. ENKA does not allow giving bribes by private or legal persons, whether directly or through third parties, even if it loses business or encounters delays because of its refusal to do so.

ENKA employees are forbidden from proposing, giving or accepting payments, high value goods, advantages, gifts, invitations, etc. that may be viewed as bribery in their relations with both public and private persons. All ENKA employees are required to report if they witness or suspect violations of the laws related to bribery and corruption. Employees that make such reports or that refuse to offer bribe will never face any sanctions.

ENKA’s principle of zero tolerance for bribery applies to all of ENKA’s operations, including all group companies and all projects in the countries in which it operates. ENKA does not cooperate with suppliers, subcontractors or other business partners who violate anti-bribery and anti-corruption laws. Employees shall ensure that companies with whom they have a business relationship, are aware of ENKA’s “Zero Tolerance” principle, and report any violations they encounter.

“This is how we do business in this country, don’t worry.”

“This payment does not require confirmation, you can pay directly.”

“A political contribution can help speed things up.”

Such comments should be considered as red flags, indicating situations that employees should approach with suspicion. If the situation seems illegal or unethical, the management should be informed or notified immediately.

The risks of bribery and corruption are higher in businesses involving interactions with public authorities. Employees involved in this type of work must ensure that all their activities and communications comply with ENKA’s rules and applicable laws. Employees should consult the Corporate Sustainability and Compliance Department, Legal Department or the Ethics Hotline if they encounter a situation or discourse that they suspect contradicts the Code or the applicable laws.

What can be considered as bribery?

- Paying a public agent/official or a third party to encourage the establishment or continuation of a business relationship, to influence the result of an administrative audit or investigation, or to influence their decision regarding taxation or other legal obligations,
- Offering anything of value, giving a gift or money to a local or foreign public agent/official in order to provide business or gain any benefit for the company,
- Attempting to persuade or persuading a local or foreign public official to do something against the law or morality,
- Providing a gift, entertainment or other advantage known or considered to be unacceptable under the applicable rules and regulations to a public agent/official.



Protecting Company Reputation

5.2. Money Laundering

“Money Laundering” is the process and actions by which individuals or entities move criminal funds through the financial system in order to hide traces of their criminal origin, or otherwise try to make these funds look legitimate. This refers also to the use of legitimate funds to support crime or terrorism.

ENKA fights against money laundering in the countries in which it does business. Even if employees are not personally in a position to violate money laundering laws, they need to be alert for any non-compliance in the way payments are made. Payments shall only be made through acceptable payment methods at ENKA.

Employees must fully understand and follow the defined procedures relating to the selection and management of suppliers and subcontractors as well as the verification of background and the validity of the identity and financial assets of customers, business partners and all other third parties.

5.3. Due Diligence Process

ENKA is committed to the highest standards of integrity in its business practices and operations and expects its business partners to maintain the same standards. For this reason, ENKA conducts due diligence for all potential business partners to ensure that its activities are carried out ethically and free from potential conflicts of interest.

Potential business partners are expected to complete the ENKA Integrity Questionnaire which addresses a comprehensive range of matters, such as the nature, ownership and management of a potential partner’s business, their policies and procedures related to ethics and compliance, human rights, anti-bribery and anti-corruption, any relations to government officials, compliance investigations conducted for any reason, legal proceedings, convictions, etc. The data collected from these questionnaires are processed, stored and used by ENKA in accordance with the applicable data protection laws and ENKA company policy. The data is stored in the database and classified as confidential and is protected by ENKA. An incomplete or incorrectly filled questionnaire may lead ENKA to reject a business partnership with the company in question.

The selection of suppliers and business partners is carried out in accordance with the corporate procedures and other relevant requirements prepared by ENKA and its subsidiaries by taking into account the criteria for the business line, the needs and expectations of the parties and the special requirements regarding the requested product or service and by treating all parties fairly and equally. ENKA takes care to select its suppliers based on their competencies and makes payments to its suppliers in accordance with the criteria defined in the contracts.

ENKA carries out a prequalification assessment of the company before entering into an agreement with a supplier. Employees participating in the selection, evaluation or auditing processes of suppliers, subcontractors and business partners must fulfill their responsibilities by adopting an impartial, transparent and objective attitude, adhering to the selection criteria and without seeking any benefit.

5.4. Conflicts of Interest

A conflict of interest may arise when an employee’s personal/family and/or financial interests influence their ability to make

legitimate and impartial business decisions on behalf of ENKA, or when it conflicts with ENKA’s interests or creates such an impression. ENKA employees are to refrain from any kind of relevance, relationship, cooperation or activity that may affect their duties, responsibilities and business decisions at ENKA, or creates such an impression.

Any situation that may represent or appear to be a conflict of interest shall be reported to the the Corporate Sustainability and Compliance Department or Human Resources Department preferably before or immediately after it occurs. Employees;

- must refrain from personal, financial, social or political activities that may prevent them from fulfilling their duties at ENKA.
- must not personally work for, provide consultation or services to, or make investments into any supplier, contractor, competitor, customer or potential customer with whom they interact or take part in their selection/evaluation as part of their duties at ENKA.
- must inform the Legal Department or the Corporate Sustainability and Compliance

Department or Human Resources Department in writing in the event of a family member being employed by a customer, potential customer, supplier or subcontractor with which ENKA cooperates, or any public institution that has influence over the operations of ENKA.

Examples of issues that may create a conflict of interest:

- Hiring, managing, supervising a close relative or personal acquaintance, allocating them work, evaluating and influencing their performance, giving approval, rewarding them.
- Selecting a close relative or personal acquaintance as a supplier or subcontractor, supervising them and evaluating their performance.
- Personally dealing with the business of competitors or other ENKA-related third parties, providing consultancy and services.
- Accepting or assuming the role of a public official or having a family member or close personal contact who is a public official that can make decisions that may affect ENKA’s business.

- Accepting invitations, discounts, gifts of great value or expensive event tickets from a supplier or customer.
- Allowing audience to believe that they are speaking on behalf of ENKA when expressing political opinions.
- Using company assets, connections and other resources to start another business or for any non-governmental organization.

The misuse of ENKA resources or authority for personal advantage is prohibited. It is prohibited to pay a third party more than the contractually agreed market-based fee for goods or services so as to receive commissions and tangible or intangible benefits in return. Conflicts of interest do not always constitute a violation of the Code and they may be issues that can be resolved when properly communicated. However, not reporting such a situation constitutes a violation of the Code. Addressing potential conflicts of interest enables the management to mitigate risks that could affect employees’ business decisions.



What can be regarded as red flags of suspected money laundering or other illegal activity?

- Attempts to provide incorrect payment information
 - Cash or overpayment offers followed by refund requests
 - Requesting to receive/give payment in currencies other than the currency specified on the invoice
 - Attempts to make payments in cash or cash equivalent
 - Unusual or inconsistent orders, purchases or payments
 - Payments from or to countries unrelated to the transaction
 - Payments made by third parties unrelated to the agreement or by an account different from the business account
 - Requests for the use of different payment methods for each invoice or group of invoices
- If any of these situations are encountered, it must be reported to the Legal Department, the Corporate Sustainability and Compliance Department or the Ethics Hotline.



How can it be determined whether a conflict of interest exists?

Employees should first ask themselves the following questions to understand whether a potential conflict of interest exists:

- Does this situation bother me?
- Is my decision likely to affect my ability to make legitimate business decisions?
- Will the decision I make affect my impartiality or make it appear so?
- Could my colleagues and managers feel that this is affecting my job or the way I do work?

- Would this be viewed as suspicious by people outside the company, such as customers, suppliers, shareholders or the media?
- Will this result in loss of revenue or profit for ENKA?
- Will I benefit financially or personally from this situation?

Answering yes to any of these questions indicates the potential existence of a conflict of interest, and the manager of such employees must be notified of the situation. Employees may consult the Corporate Sustainability and Compliance Department or the Legal Department when in doubt.

Protecting Company Reputation

5.5. Gifts and Entertainment

Giving presents, invitations or entertainment are behaviors that can increase goodwill between business partners, and have become customary in many countries. However, care must be taken with gifts, invitations and entertainment to avoid influencing fair and objective business decision-making and potential conflicts of interest. If it is believed that a business decision by ENKA was made due to a privilege, advantage, gift, invitation or entertainment that could be considered bribery, rather than on the basis of logic and competence, ENKA's reputation may become compromised, and in some situations, violations of law may even emerge.

Gifts, invitations and entertainment, under the condition they are not cash or its equivalent, shall only be accepted when appropriate, reasonable and consistent, and when they do not create the perception that there has been an improper effect on the receiver. It must be ensured that these accepted gifts, invitations or entertainments do not violate the relevant local and international laws. Any gift or entertainment received or given must always be appropriate, customary and reasonable in terms of value, frequency or timing. The giving or receiving of any gift or entertainment that may be considered to have a material effect on a present or future business action of the company, or otherwise generate a conflict of interest, is prohibited.

Sometimes, customers, suppliers, contractors and other business partners may request entertainment or gifts with inappropriate content or excessive cost. In such cases, employees shall politely decline such requests by referencing ENKA Code of Business

Conduct, and report the matter to their managers. In the event of an unacceptable gift being offered by a supplier, subcontractor or other business partner, it should be politely and clearly explained that the gift must be returned, as it violates ENKA's gift and entertainment policy, and the management should be notified to determine whether any further sanctions are necessary. Where necessary, a senior manager should inform the Corporate Sustainability and Compliance Department on this matter. Attempts to resolve the problem by covering the cost of such gift or entertainment, or offering the customer to cover it, shall not be made.

Modest gifts, invitations or entertainment include those falling under the following categories:

- Calendars, agendas, pens and similar promotional materials with little monetary value,
- Products such as chocolates or flowers which are not of high monetary value, given on official and special occasions in the countries of operation,
- Ordinary refreshments, such as food and beverages, offered at a business meeting organized in accordance with company procedures,
- Necessary and reasonable expenses for business travel in accordance with company procedures.

In geographical areas where the exchange of gifts, invitations and entertainment is customary, gifts and entertainment are accepted as long as they remain within the acceptable range of value in the region, do not

exceed widely accepted business practices, do not entail any obligations, and are approved and recorded by the relevant management level. The receipt or offering of any gift higher in value than USD 100.00 (United States Dollar) must first be approved in writing by the relevant Project Manager, Vice President or Director.

5.6. Use of Agents, Consultants, Representatives and Other Third Parties

ENKA may be liable under anti-corruption laws and local laws not only for the actions of its employees, but also for the activities of its business partners. If an employee suspects that a business partner or other third party might offer a bribe, but does not take the appropriate steps to prevent such payments, this may be seen as implicit authorization of the bribe.

ENKA expects from its joint-venture partners, suppliers, contractors, consultants and other business partners to maintain a zero tolerance principle for bribery.

When interacting with intermediaries or third parties such as joint-venture partners, suppliers, contractors, consultants, employees must follow the process with due care and act in accordance with the legal requirements, contractual requirements, and ENKA's policies and procedures. Any suspicious behavior, transaction or receipt must be reported immediately to the Ethics Hotline, the Corporate Sustainability and Compliance Department or the Legal Department.

5.7. Trade Controls

Export and import transactions are subject to many trade control laws and regulations that restrict exports and other exchanges with various countries, institutions and individuals. ENKA complies with all import and export laws applicable to it by virtue of its operations.

ENKA employees must ensure that the export, re-export or resale of any controlled equipment, technology or know-how are carried out in compliance with the requirements of all export licenses and all applicable regulations. Employees who transport and/or use products subject to export and import controls or sanctions are responsible for understanding and following the relevant laws, regulations and company rules.

Before engaging in an operation that may be subject to export control laws, the department in question must check the current information regarding frequently changing sanctions, export restrictions, economic sanctions, boycotts and embargo laws; and where necessary, support should be received from the Legal Department or Supply Chain Department to verify the validity and actuality of the information.

5.8. Preventing Unfair Competition

ENKA promotes fair and strong competition in its operations, and communicates with public authorities in its countries of operation in a transparent manner and in accordance with the fair competition laws of the relevant country. Maintaining an ethical, transparent and fair approach in its relations with its competitors, ENKA avoids any anti-competitive practices, follows confidentiality rules, and strictly abstains from any action that may fall within the scope of monopolization and trust.

All employees are required to act in accordance with the applicable local and international competition legislation, and avoid cartelization. In particular, employees representing the company in professional chambers and trade associations are required to understand and implement the relevant laws and carry out all communications in accordance with the framework determined by these laws.

ENKA employees are required to avoid improper agreements with competitors or any contact that might create a false impression and it is forbidden to offer agreement or commitment regarding any aspect of competition between ENKA and a competitor, including price fixing, collusive tendering, contract terms, prices and the allocation and/or restriction of customers. Employees shall not provide, receive or exchange any commercial information with a competitor representative, face-to-face, over digital platforms or at an industry meeting. If such a situation arises, the meeting shall be ended or ENKA employee shall left the meeting by stating ENKA's rules on this matter. After that, the Legal Department or the Corporate Sustainability and Compliance Department shall be informed.

5.9. Political Activities and Political Contributions

ENKA adopts an impartial stance on politics, religion and philosophy. To this end, ENKA implements a policy of not making any political donations or funding. No ENKA funds or assets can be used to donate and/or contribute to any political party or candidate at any level of government or in any country (even where permitted by law). Political donations include both monetary contributions and all types of in kind/non-monetary in nature.

ENKA respects the personal and political views of its employees. Employees shall ensure that their personal political views do not affect the reputation of the company, and when making political statements or engaging in such activities in their daily lives, they must clearly state that their views or actions do not reflect those of ENKA, and they are not making a statement on behalf of ENKA.

Unless expressly authorized by the President and Chairman of the Executive Committee of ENKA, no employee shall engage in any public policy activity on behalf of ENKA, or appear to represent the views of the company.

What topics shall never be discussed with competitors?

- Pricing information, pricing principles and conditions
- Market, customer and region information
- Corporate strategies, future plans, business opportunities and new investments
- Capacity and service volume
- Bids and tender processes
- Information classified as confidential by ENKA



Protecting Company Reputation

5.10. Donations and Sponsorships

ENKA supports campaigns, organizations and activities that benefit the communities in the regions in which it operates as part of its responsible management approach. These supports can be in the form of cash, services, materials or second-hand materials, as well as humanitarian aid and/or health aid support in the event of emergencies or disasters.

To ensure that such aid complies with the law, ENKA cooperates only with associations, foundations or other non-governmental organizations that comply with the law and that are transparent in their activities. Accordingly, it is ensured that all donations and sponsorships to be made comply with the law and ENKA procedures, and have the written approval of the relevant Executive Board Member. It must also be ensured that the cooperating non-governmental organization is not involved in any illegal, terrorist or political activities, and that the donation contributes to ENKA's sustainability strategy. The accounting records of such donations must be made appropriately and reported to the Corporate Sustainability and Compliance Department to be included in the annual reports.

It must be ensured that these donations and sponsorships do not directly or indirectly support any political party, political view or interest, do not have the potential for conflict of interest, and are not made to gain an advantage.

ENKA can develop projects, undertake sponsorships and make donations in this context with such legitimate organizations as non-governmental organizations and student societies. All these supports are regularly disclosed to the public through the appropriate channels. It is forbidden in ENKA to receive cash or equivalent payments from suppliers, subcontractors or other

third parties, even if they are for donations, or to direct them to make payments or donations to any other organization. Internal communication tools should not be used for personal donation campaigns outside of the official donation campaigns approved and initiated by the President and Chairman of the Executive Committee of ENKA, and announced through ENKA's corporate channels sustainability@enka.com or enka@enka.com.

5.11. Control Mechanisms

Internal audit efforts are carried out at ENKA for the early detection of bribery and corruption risks. In ENKA Head Office departments, subsidiaries and all projects, regular audits are carried out by the Internal Audit Committee, consisting of experts from the ENKA Finance and Accounting, Financial Control, Sustainability and Compliance, Quality Management, HSE Management, Legal, Supply Chain and Human Resources departments. These audits are conducted and reported in accordance with International Audit Standards, and corrective actions regarding the identified nonconformities are promptly implemented.

In addition to these audits carried out in accordance with ENKA's internal audit procedure, ENKA ensures transparency and responsibility within its management structure through regular audits and reports published by independent audit companies.

All employees are required to display a transparent and open attitude regarding their own processes and works during these audits, to participate in audits appropriately and to immediately take the necessary corrective actions.

5.12. Accurate, Complete and Fair Disclosure

ENKA's accounting, records and financial reporting are carried out in a way that accurately reflects the economic aspect of the company's business activities, based on widely accepted accounting principles, standards and company accounting policies. All accounting records and supporting documents fully and clearly reflect the relevant expenditures. No secret, unregistered accounts or assets are allowed to exist in financial systems in which the necessary control systems have been established.

Employees are responsible for checking the accuracy, integrity and timeliness of the financial information with which they are entrusted. Internal financial controls shall be complied with and transactions shall be processed only in accordance with authorization or after obtaining a certain approval and recorded to reflect the relevant accounting period with the necessary supportive documents. Any information, data or document that must be retained for litigation, investigation or other legal reasons shall not be destroyed or altered without prior approval.

The keeping or submission of false, incomplete or misleading financial records, reports or invoices, even if unintended, is a violation of the law in many countries. Employees must promptly report any information they believe to be false or any irregularity in the books, reports or financial data of any company, or any weakness in the accounting and financial systems.

Red flags that employees may encounter or observe during financial reporting and controlling:

- Inconsistencies in records and payments
- Financial results, reports that appear to be inconsistent with basic performance
- High expenses, discounts, profit margins
- Prepayments made without reasonable justification
- Unacceptably high payments, commissions, expenses, gifts and entertainments
- Failures to follow review and approval procedures
- Incomplete or misleading statements about the content or reporting of a transaction



Section 6

Protecting Company Assets

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Protecting Company Assets

6.1. Proprietary and Confidential Information

ENKA's proprietary and confidential information is one of its most important assets. "Proprietary and confidential information" generally includes non-public information that, if revealed, may benefit competitors or harm ENKA. Examples include technical information, designs or process data, pricing information, business or strategic plans, work processes and know-how, project practices, software and technology, research and development, customer and supplier lists, as well as third party information entrusted to ENKA that ENKA is obliged to protect, such as the proprietary and confidential information of clients and partners.

ENKA may enter into partnerships with companies that may under other circumstances be competitors, suppliers or customers. In order to ensure proper communication in these partnerships, the necessary measures must be taken to protect private and confidential information from unintended or intentional sharing, or use outside the partnership.

Managers are responsible for ensuring that the necessary measures are taken to protect proprietary and confidential information from unintended or deliberate improper use and that such information is shared only with employees who need to know. All ENKA employees are responsible for staying alert to protect ENKA's proprietary and confidential information, both during and outside working hours, and to comply with ENKA's policies and practices that determine and limit access to its information and systems.

It is prohibited to share in public places, or in places where others can hear, any proprietary or confidential information of employees, ENKA, customers and partners, and information entrusted to ENKA that ENKA is obligated protect. Only authorized employees are allowed to share this information with employees and third parties on a need to know basis and only authorized persons may disclose information about ENKA, its subsidiaries and projects to the

public, media or other third parties. Employees' responsibility to keep ENKA's information private and confidential continues even after their employment at ENKA ends.

6.2. Information Security

All ENKA employees are required to behave in accordance with Information Security Management System (ISMS) requirements and the related corporate policies and procedures, and ENKA data, information and documents shall be classified in accordance with corporate information protection practices, with access authorizations shall be established, stored, shared and removed. It must be ensured that access to ENKA information and documents is provided only to those who need it for legitimate business purposes and that are authorized to view the said information. The unauthorized sharing and disclosure of confidential information, or information that is not expected to be known to the public in general, is prohibited at ENKA.

All ENKA employees are required to understand and implement the relevant information security policy, principles and procedures. ENKA employees must not request confidential information unrelated to their responsibilities and must not accept if this information is shared with them. It is prohibited to share ENKA's confidential and proprietary information with third parties without management approval and, where necessary, without a proper confidentiality

agreement. It is necessary to ensure that all kinds of information and data sharing is made in accordance with corporate procedures and any possible information security violation must be reported immediately.

ENKA owns or has been licensed to use the technology it uses in its business, including hardware, software and computer systems. This technology and the information stored on our computer systems are critical to ENKA's success. Everyone who uses a computer at ENKA is responsible for protecting these valuable technological resources. If anyone believes that somebody is placing the performance and/or security of any ENKA, or third party information or systems at risk, they must immediately notify their supervisor or Information Technologies (IT) Manager.

Against all possible cyber security risks, only institutionally approved systems and tools shall be used for the storage, transmission and backing up of ENKA information. If a need arises to add software or hardware to an ENKA computer, approval must first be obtained from the IT Department as such additions may pose a security risk to the ENKA network. Employees must never install software that is not licensed or that violates copyright laws on their work computers. Employees must not attempt to disable, circumvent or overcome such security controls, such as firewalls, browser configurations, privileged access, antivirus software and deletions of system logs. Suspicious links or attachments in e-mails should never be opened.

How are Information Security violations to be reported?

In accordance with ENKA policies and procedures, all information security violations that may harm the confidentiality, integrity and accessibility of information shall be reported. These include, but are not limited to, clicking links or attachments in suspicious e-mails and unintentionally sharing confidential information with the wrong recipients.

Information security violations can be reported by all ENKA employees or all relevant stakeholders. An information security violation can be reported by the person who notices it by calling the Ethics Hotline or filling out a violation form and submitting to the Information Security Management System Administrator by e-mail, by phone or in person.



Protecting Company Assets

6.3. Confidential Information of Third Parties

Customers, suppliers and business partners often entrust ENKA with highly confidential information and data. When using this information and data, all employees are subject to comply with the relevant laws, ENKA Information Management System procedures and practices, customer requirements and confidentiality agreements, if any. Even after leaving ENKA, employees must take due care to respect and protect any knowledge relating to third parties that they may have.

In order for ENKA to compete effectively in the market, some competitive information may be collected, but the information collection process is always conducted in a responsible, ethical and legal manner. In this regard, employees can generally benefit from publicly available information on the Internet and newspapers, or can benefit from annual reports and published sales information. Furthermore, provided that it is not related to special and anti-competitive practices, obtained from interviews with customers and information gathered by professional chambers or during sectoral conferences may also be used in compliance with related laws. If the information at hand is related to public bidding, the Legal Department shall always be consulted to confirm its legality before making use of it.

Employees shall avoid even giving the impression of being engaged in inappropriate information gathering activity. If an employee becomes aware of confidential or proprietary information about a competitor, they must contact the Legal Department immediately.

Sometimes, new employees may have confidential and private information about ENKA's customers, partners and competitors due to their previous employment. This

information may include proprietary technical, design or process data, trade secrets or confidential information, software licensed by the former employer, or any information that is not publicly available, and may be specified or stated to be specified as private or confidential.

All new recruits must respect the confidentiality of this information. At ENKA, it is never expected from an employee to disclose confidential or proprietary information about their previous employer, or to violate any confidentiality agreement they have with their previous employer. If an employee offers to disclose such information, it shall be refused.

6.4. Personal Use of Company Assets

From time to time, company equipment and computer systems may be needed for limited personal use. Such use is not a problem as long as it is reasonable and for business purposes. However, all company assets offered to employees by ENKA, including time, personnel, materials, equipment and information, should be considered as for business use.

Employees are responsible for the proper protection and use of ENKA's assets and are expected to make every effort to prevent waste, loss, damage, abuse, irregularity, theft, embezzlement, violation or other irregularities. Unless otherwise specifically authorized, employees are required to use resources carefully and professionally, and only for their primary business purpose. The unauthorized, malicious, unethical or improper use of ENKA property, such as materials, equipment, assets that may be subject to intellectual property rights, computer systems and software, company vehicles, etc. is never tolerated. Employees are obliged to fulfill their responsibilities regarding the protection of ENKA's assets against loss, theft or abuse.

It is not allowed to use company assets for personal purposes or to do business on behalf of others and if exploitation is identified, it may be considered as fraud and theft. As such, it is necessary to ensure that the Company's resources are not being used for personal interests and are not the subject of unnecessary excessive expenditures.

The use of ENKA resources to conduct illegal activities or to access or download obscene, sexually explicit or inappropriate content, to gain personal advantage/profit or to communicate discriminatory, harassing or threatening messages is prohibited. All rights of ENKA relating to the monitoring and assessment of messages and information sent and received using its resources are reserved and ENKA reserves this right to the fullest extent permitted by the applicable law.

ENKA may monitor, inspect or remove all ENKA commercial information stored or processed by ENKA within its own systems and/or equipment, regardless of whether they are of confidential, business related or personal nature. Employees should have no expectations of personal privacy while using these resources. It should be known that electronic documents and information can be restored even after being deleted, and therefore care should be taken when using confidential or important information in electronic communications. Carrying out propaganda or similar activities within company premises and the use of company assets for political activities are not allowed.

Personal use of networks and internet access must be kept to a minimum, and the company e-mail account must not be used for personal activities. Employees shall always use a professional and respectful tone in all written communications.

6.5. Patents, Trade Secrets, Copyrights and Trademarks

Patents, trade secrets, copyrights and trademarks are legal terms that define when an invention, know-how, product, idea, written work or name are owned by an individual or company, and the use of such by others without express permission is prohibited.

ENKA is committed to full compliance with the provisions of all applicable laws and license agreements relating to copyrighted material, including written material, photographs and software, and obtains either licenses or subscriptions of reference materials such as the necessary software, products and standards for the use within ENKA. The unauthorized duplication or transmission of content such as articles, data, photos, music, videos or software is illegal and content posted on the Internet does not entitle anyone to its free use. The name or logo of another company should not be used without the permission of that company. Permission from multiple sources may be required for the use of such content.

Employees may sometimes develop ideas, processes and technology on ENKA's behalf or within the scope of their work for ENKA that will be protected by patents, copyrights and trademarks. This "intellectual property" does not belong to the employee, but to the company or its customers, depending on the situation and the terms of the customer's agreement. In such cases in ENKA, employees assign these intellectual property rights to ENKA generally or to the customer, as necessary.

6.6. Social Media

ENKA respects the freedom of its employees to use and express themselves through social media. However, all posts made by employees about ENKA affect ENKA's reputation and it is often not possible to remove information or images shared online. For this reason, employees should not use personal social media tools for business purposes. Employees are required to use these platforms responsibly and ensure that their use does not affect the reputation of the company, their personal performance or their peers.

ENKA expects its employees to not make posts that are racist, threatening, abusive, discriminative or insulting; that support and/or encourage criminal acts or violence and that may be considered obscene according to a culture. Employees must ensure that their social media communications do not violate defamation, harassment or copyright laws etc. or company principles. Any employee exhibiting such behaviors bear all responsibility for any loss of reputation or accusations raised against ENKA.

Employees should avoid giving the impression that they are speaking or acting on behalf of ENKA on social media channels. It must be clear that their posts reflect only their own views, and that statements are not being made on ENKA's behalf.

In this context, employees are expected to:

- Not share any confidential or strategic information, including trade secrets of ENKA, on their personal accounts on social media and other networks,
- Avoid words and attitudes that disparage ENKA's services, customers, suppliers or competitors,

- Not post photos or videos of workplaces and areas within offices or projects that may put the security of work areas or information security at risk,
- Not respond to questions from the media or other institutions about ENKA and not make any comments on behalf of ENKA,
- Indicate clearly that posts about their personal life reflect their personal views and that the company views may differ,
- Take care to not share content that may be considered other types of discrimination based on religion, sect, language, race or gender, or any content that encourages crime,
- Ensure that they protect their personal data and information,
- Not use business e-mail accounts for their own personal needs other than business communications,
- Not store or share pictures, folders or files that may contain confidential information on personal media channels without the knowledge and permission of their managers.

Protecting Company Assets

6.7. Insider Trading

Inside information is sensitive information held within the group that is not publicly available and if such information is disclosed, it is very likely to have a serious impact on the market price of shares or other securities of ENKA or another specified company. When carrying out their work, ENKA employees may gain access to “inside information”, which has not yet been made public, about customers, competitors and contractors. Employees must not use this information for their own interests, or those of their relatives, including share purchase and sale transactions; they must comply with applicable national and international laws, and not disclose this information unless the information has already been disclosed by the company’s official channels.

6.8. External Requests, Presentations and Statements

Some employees may have access to information that is not publicly available under normal circumstances regarding the financial results of ENKA or other companies. Employees must be careful not to share this information in requests for information from outside the company or in presentations to outside groups.

If it is necessary to make presentations to outside groups, such as at business conferences or training seminars, the information must be shared with full adherence to the information security criteria. Any presentation containing information that is not publicly available or that contains private information or details of processes, must first be approved by the relevant department manager, and then by the ENKA Finance and Financial Control Departments or Corporate

Communications Department, depending on the subject of the presentation.

ENKA’s policy is to never comment on stock market rumors. Only designated ENKA officials/spokespersons are authorized to talk about the company’s financial results. If a member of the press or stock market analyst contacts an ENKA employee for information, these people shall be directed to the ENKA Investor Relations Department immediately. Only company spokespersons approved by the ENKA President and the Chairman of the Executive Committee can make statements about the company’s activities and statements in the written, oral or visual media. Employees shall not make any statements about the company to any member of the press, and shall forward these requests to the Corporate Communications Department.

If a government official or inspector contacts employees, the Legal Department must be notified. ENKA’s records are not to be submitted to investigations conducted by government agencies without the written approval of the Legal Department. If a joint-venture partner or customer’s investigator contacts an employee, or requests information or an interview, the Corporate Sustainability and Compliance Department must be informed before any information or document is shared.

6.9. Reporting and Record Keeping

All kinds of reporting and record keeping are done in a complete, accurate and timely manner at ENKA. Failure to accurately record transactions, creating information that distorts or misleads the truth, or encouraging others to do so, may result in legal action or fines for employees or ENKA.

For this reason, all transactions within ENKA must be recorded in an accurate, complete and timely manner by its employees, and must be compatible with the necessary supporting and additional documents. No deceptive, misleading or inaccurate information shall be included in any records. In accordance with corporate procedures, all forms of documentation, such as corporate policies, procedures, reports and contracts, become valid after being controlled and approved by the relevant manager. All employees are responsible for ensuring that all relevant information is accurate and present in their records. In this context, internal and external auditors, tax authorities and other regulators expect all employees to display a transparent and consistent attitude during investigations of institutions, and they are expected to present the documents that need to be shared accurately and completely.

ENKA keeps a large amount of documents and records, and these may exist in both on paper and electronically. It is of great importance that employees know how long the documents and records within their responsibilities are to be retained, and how ENKA disposes of such documents. ENKA has detailed retention principles and practices for documents and records, whether related to projects or not, and employees are required to understand and comply with these practices. If the documents in question are reported to be related to a lawsuit, investigation or audit, employees must keep these documents in an appropriate medium and in accordance with the document management system guidelines, ensuring that these records can be presented in a complete, correct and consistent manner.

Can employees introduce themselves as ENKA employees on Facebook, Twitter, LinkedIn, Instagram or other social and career networking websites and blogs?

If employees decide to identify themselves as ENKA employee on their social media accounts, or to post about their working life at ENKA, they must ensure that they post and act in line with the behaviors expected from employees and described in the ENKA Code of Business Conduct. In posts including statements on current political and social issues, providing personal reference for a connection in LinkedIn etc., employees must clearly indicate that these reflect their personal views only, and that they do not speak on behalf of ENKA.

ENKA

Engineering for a Better Future

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