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1- GENERAL PRINCIPLES

1.1. Introduction

Klimasan Klima Sanayi ve Ticaret AŞ ("Company") Code of Ethical Conduct and Code of Practice is a general guide for acceptable and appropriate behavior in the company and you are expected to comply with its content; however, it may not contain all the detailed information you may need during your employment. These rules may be amended or revised from time to time as Company policies are continually reviewed and kept up to date.

You should familiarize yourself with these rules so that you can recognize in advance any suggestion or behavior that may lead to a violation. All employees are responsible for their own behavior. Violations may lead to disciplinary action, including dismissal and criminal sanctions. There will be absolutely no **retaliation** for an employee who in good faith reports a violation or suspected violation.

As an employee of the Company, it is your responsibility to follow our policies and adhere to our rules as issued or amended.

As a signatory and supporter organization of the United Nations Global Compact (UN Global Compact), this document refers to the Sustainable Development Goals' articles **5 - Gender Equality, 8 - Decent Work and Economic Growth, 10 - Reducing Inequalities, 16 - Peace, Justice and Strong Institutions**, and states our attitudes and efforts within the scope of the relevant goals.

1.2. Purpose and Scope

The purpose of this Code of Ethical Conduct and Code of Practice is to set the values, principles and guidelines that shape the behavior of **all Company employees**, regardless of hierarchical order. This guiding document should be used as a professional and personal practice tool to enable employees to fulfill their duties within the framework and scope of existing Laws, Rules and Regulations, with the highest level of integrity in all aspects of their actions.

The ethical rules that all employees of the Company must pay attention to, comply with and respect include, among others, the laws of the country, the contracts, agreements and partnerships concluded by the Company, the protection of the Company's privileged information and the related principle of confidentiality.

The Company believes that every individual is important in terms of customer satisfaction, innovation and the Company's bottom line, and this is one of the most important pillars of its success and growth.

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2- OUR VALUES

2.1. Our Mission

To create value for our customers by offering solutions that will preserve and/or display food and beverage products in a healthy and delicious way, with the best quality and price balance.

2.2. Our Vision

To be a company that grows continuously with new breakthroughs, maximizes the satisfaction of its customers, employees and shareholders, is a leader in target markets in Turkey and the world, has achieved business excellence, and creates value for society and the environment.

2.3. Our Values

Quality: Since the day we were founded, constantly striving for the better is our most fundamental quality principle.

Customer Satisfaction: We work to respond to the needs of our customers and create value for them at every stage of our organization, from product design, production, sales, after-sales services and all activities within our organization.

People Orientation: We see our employees as the biggest factor in ensuring the continuity of our organization's raison d'être and vision, protecting and transferring our values to future generations, and sharing a common corporate culture, and we attach great importance to our human resources.

Team Spirit We share a participatory, systematic, corporate management approach that values teamwork.

Cooperation: We attach importance to maintaining long-term relationships with our customers with a business partnership approach.

Globalization: We believe in the importance of rapidly adapting to the constantly evolving technologies and commercial requirements in the world.

Environmental Sensitivity: We constantly share the importance of creating value for the "environment" with an understanding that will cost the whole society in all processes that make up our activities.

Ethical Values: We see being an exemplary company with our business principles, treating our employees equally and fairly in accordance with human rights and freedoms, and always being open to different ideas as part of our ethical values.

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Our Ethical Values

*Reliability

Open and transparent communication,
Consistently communicating and realizing the vision
Good business management and efficient use of resources

*Equity (Being Fair)

Non-discrimination and equal treatment,
Objectivity in rewarding, promotion and recruitment,
Diversity and openness to different ideas

*Pride

Being proud of your own work,
Teamwork and pride in business achievements

*Respect for Employees

Support development by recognizing achievements,
Ensuring employee participation in decisions,
Taking into account individual wishes and expectations

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3- ABOUT OUR RULES

The **purpose** of the Code of Conduct is to set out the values, principles and guidelines that shape the behavior of all Company employees, regardless of hierarchical rank, and should be used as a professional and personal practice tool to enable employees to perform their duties with the highest level of integrity in all aspects of their actions, within the framework and scope of existing Laws, Rules and Regulations.

This document may not cover all potential situations that Company employees may encounter. The absence of specific guidance or instruction covering a particular situation does not preclude an employee from applying the highest ethical standards applicable to the situation.

If the employee has any suspicions about a suspicious situation that may occur, they are expected to first report directly to the following;

- Their line managers and senior managers,
- Human Resources Department or Company Legal Counsel
- and/or to the Company Ethics Hotline (etik@klimasan.com.tr) managed by the Company Internal Audit Department

3.1. Why are there rules?

The Code of Conduct has been established to help:

- Ethical behavior by employees and related parties,
- Preservation of company values and culture,
- Understanding the company's expectations from its employees and how they should proceed in case of need,
- Ensure that business is conducted in accordance with the rules (policies, procedures, regulations, etc.) established by the Company and the legal obligations (local/global laws, regulations, standards, etc.) to which the Company is subject

3.2. Who Should Follow the Rules?

The Code of Conduct applies to all employees of the Company and its subsidiaries, including their boards of directors, as well as business partners, consultants, subcontractors and their employees. The Company requires all parties with whom it cooperates to act in accordance with the Code of Conduct.

3.3. What are our expectations from our employees?

- Recognize and act in accordance with the ethical and moral codes of conduct adopted by the Company and adopt this document as a guide for themselves,
- To know, understand and act in accordance with the Company's environmental, occupational health and safety, quality and sustainability practices,

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- If they are aware of possible violations, they should report these issues through appropriate communication channels,
- Behaving in a cooperative manner in case they are asked to testify in any internal/external investigation or review,
- Representing the Company at all times in accordance with the code of conduct and Company values,
- Supporting third parties to ensure that they act in accordance with ethical codes of conduct

3.4. What are the Behaviors and Responsibilities Expected of Managers?

- Recognizing and acting in accordance with the ethical and moral codes of conduct adopted by the Company and adopt this document as a guide for themselves,
- Encouraging employees to create and develop the ethical culture targeted by the Company,
- Understanding the violation notifications conveyed to them by employees and making or guiding them to make the necessary investigations,
- Creating an environment where employees affiliated with them can express their ideas comfortably,
- Acting in accordance with the code of conduct and relevant Company rules when evaluating employees,
- Not directing their employees in a way that violates the rules of ethical behavior in any way,
- Not allowing employees to violate the code of ethical behavior,
- Not interfere with, retaliate against, and protect the confidentiality of employees who provide information in the investigation in the event of a breach report

3.5. What are the Behaviors and Responsibilities Expected from Our Business Partners?

- To recognize and act in accordance with the ethical and moral codes of conduct adopted by the Company and adopt this document as a guide for themselves,
- To comply with local/global legal obligations in the regions where they operate,
- To comply with the obligations they have undertaken in contracts/specifications etc. regarding the works they have carried out with the Company,
- Compliance with ethical rules/values,
- Complying with legal legislation on employee health and environmentally friendly practices, setting goals for development and encouraging continuous improvement of health and safety performance by encouraging best practices,
- To avoid all forms of human rights abuses such as child labor, human trafficking, forced labor, etc. and take measures to prevent them,
- Absolutely to avoid activities such as bribery, corruption, money laundering, terrorist financing, etc. and act in accordance with local and global laws/regulations on these and similar issues,
- To protect all kinds of business-related documents, records, correspondence, information and transactions obtained during commercial activities with the Company,
- To protect all applicable data and comply with information security laws and regulatory requirements relating to the processing, transmission or disclosure of such data and information

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3.6. *Sale of Commercial Products to Personnel

Commercial products can be sold to employees within the Company upon application. The details regarding the said practice are detailed in TAL-IKY-036 Personnel Commercial Product Sales Instruction, and changes, announcements and notifications regarding the subject are made to employees via e-mail and SMS. Our employees can apply to the Human Resources Department based on the model price information specified in the periodic announcements regarding the models in stock.

4- DOING THE RIGHT THING

4.1. When Should You Speak Up?

If something unsafe, unethical or potentially harmful is seen, all employees have a responsibility to speak up, within legal limits, in a non-defamatory manner. When there is a problem, help is needed or a concern is raised, there are several options.

4.2. Ways to Raise Your Voice

It is important to follow the steps below in sequence.

- 1- If you can speak to **your line manager** about your concern, he or she should be contacted.
- 2- If you are unable to speak to your line manager or if there is a concern directly related to him/her, the matter can be discussed with **another manager in your team** .
- 3- If it is not possible to meet with any manager from the team, the issue can be transferred to the supporting departments of **the Company Human Resources** and **Legal Counseling** .
- 4- If you feel that the options described above are not sufficient, you should contact the **"Klimasan Ethics Line"** managed by the **Internal Audit Department** , which reports directly to the **Company's Board of Directors / Audit Committee** .

4.3. *Klimasan Ethics Hotline

The Company has an **"Ethics Hotline"** application for the use of all Company employees. Klimasan Ethics Line is a communication platform created with the understanding that "one piece of information can change everything", where employees can freely make ethical declarations. KEYS-KP-009 Whistleblower Hotline Procedure has been established, which regulates how notifications regarding violations should be made, and the relevant document has been approved by the Company **Audit Committee** , **the Chairman of the Board of Directors** and the CEO of **Metalfrío**.

The process regarding notifications is managed **centrally** by **the Internal Audit Department** .

Purpose of the Ethics Hotline

Establishing communication channels that will enable the notification of any situation that may arise against the Company and ensuring that the notifications made are handled in the most **professional** and **impartial** manner.

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Which Notifications can be made to the Ethics Hotline?

Both anonymous and named reports can be made to the Ethics Hotline. The Ethics Hotline is allocated for reporting the following types of transactions, actions and any situation that may occur against the company;

- Contrary to all applicable laws and internal regulations,
- Contrary to applicable accounting practices, regulations, procedures and principles,
- Damaging the internal control environment,
- Contradicts the Company's procedures and instructions,
- Risk of material and/or immaterial loss for the Company, including reputational risk,
- Any other serious risk, including all risks of misconduct such as bribery, corruption, theft, document forgery, conflicts of interest, breaches of confidentiality,
- Violating the rules of behavior addressed in the Klimasan Code of Ethical Conduct Document

Disclosures may be made about any party doing business on behalf of the Company, including any director, employee, statutory auditor, business partner, customer, supplier, consultant, external auditor, institution or governmental authority.

Which Issues Are Outside the Scope of the Ethics Hotline?

- Complaints about wages, salaries and the promotion process,
- Misunderstandings between colleagues,
- Equipment that does not work,
- Other minor issues such as smoking, clothing, etc,
- Other issues not covered in the Ethics Hotline Policy

However, the workflow specified in the **Suggestion Evaluation System Instruction** should be followed for administrative or technical issues that do not constitute a report of ethical violation.

Key Elements of the Ethics Line

- Maintaining high standards of **confidentiality** and **non-retaliation**
- Handling all information in the most **professional** and **impartial** manner
- The necessary actions are taken to evaluate and resolve the employee notification and / or the necessary guidance is provided for their implementation

On the other hand, in the event that it is confirmed that the person transmitting the information is **malicious** and the report turns out to be **unfounded** as a result of the investigations, the Internal Audit Department may make a recommendation to the Company Human Resources Department regarding the action to be taken against the relevant person.

How to Report to the Ethics Hotline?

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Any breach may be reported by using any of the communication channels set out below:

- **Email** : The e-mail address etik@klimasan.com.tr (Klimasan Ethics Hotline), which is accessible only by the Internal Audit Department, has been established for the notifications to be made.
- **Phone**: Internal Audit Department "+90 236 236 22 33 / Ext: 605"
- **Mail**: It can be made to "Klimasan Klima Sanayi ve Ticaret AŞ Manisa OSB 1 Kısım Keçiliköy OSB Mahallesi Cumhuriyet Caddesi No 1 45030 Yunusemre / Manisa - Türkiye" on behalf of "Internal Audit Department".

Operation of the Process Regarding Notifications to the Ethics Hotline

- Every employee of the Company has the **right** and **responsibility** to report any situation that may arise against the Company mentioned above.
- All notifications will be treated with **absolute confidentiality** under all circumstances. It is the responsibility of the **Audit Committee** (which also performs the activities of the Ethics Committee) to keep all matters communicated confidential.
- E-mails can be sent to the above-mentioned electronic communication address with both **internal** and **external** extension.
- Notifications can also be made completely **anonymously**, without names and contact information.
- All notifications sent are recorded by sequence number and regularly reported to the Board of Directors by the Internal Audit Department through the Audit Committee.
- In cases where it is necessary **to investigate** the matter **in detail**, **take extra precautions** regarding possible risks, or conduct an investigation, the matter is brought to the agenda of the Board of Directors by the Audit Committee and the action to be taken is determined.
- The Audit Committee monitors the examinations carried out by the Internal Audit Department in line with the decision of the Board of Directors.
- The final report prepared by the Internal Audit Department is brought to the agenda of the Board of Directors and a decision on the issue is taken.
- The Audit Committee has the authority and responsibility to monitor the results, the measures taken by the Senior Management and Executive Boards and the actions taken.

4.4. Employee Protection

All notifications submitted to the Audit Committee and/or Internal Audit Department will be treated with **utmost confidentiality** . This confidentiality aims to protect the reputation of the employee, the Company and the shareholders.

Employees are expected to make the above-mentioned notifications regarding any situation that may occur against the company as a result of a **good faith, honest** and **professional** conscientious evaluation.

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The **protection of the reporting employee** and the **confidentiality of the information** is the responsibility of the **Audit Committee**. Necessary measures will also be taken by the Senior Management in these matters. All persons who report to the Ethics Hotline / Audit Committee **are under the protection** of the Audit Committee **and cannot be subjected to pressure, discrimination or mobbing**.

4.5. Sanctions

Violators of the Company's Code of Conduct, policies and procedures will be subject **to disciplinary action** , up to and including termination of employment, if necessary.

Disciplinary sanctions will also be imposed on those **who approve, direct or** have knowledge of improper behavior or **conduct** that causes a breach of the rules and **fail to report it appropriately** . Furthermore, **there is no tolerance** for those who behave in a negative manner towards those who make complaints and notifications or assist in the investigation .

5- CODE OF ETHICAL BEHAVIOR

5.1. Relations with State Organs

The laws and regulations applicable to all judicial organs in which the company operates must be observed. All employees are responsible for having sufficient knowledge of the laws and orders relevant to their duties to be aware of potential hazards and to know when legal advice is required.

Especially in dealing with public officials, employees should adhere to the highest ethical standards of business ethics. Employees may not, directly or indirectly, in any way, offer, provide or solicit special treatment, privileges or promises of future value/gains in exchange for anything of economic value.

*Company employees are expected;

- To act in accordance with the Klimasan Code of Ethical Conduct when communicating with government and public bodies,
- To be cooperative and conciliatory in their communication with government and public bodies,
- To inform and involve their manager(s) in processes and transactions with the state and public bodies.

5.2. Compliance with Local/Global Rules and Laws

Company operations/employees **are subject to the laws of many countries and jurisdictions** around the world, particularly Turkey. Within the scope of international trade, relevant rules and ethical values must be respected, respecting the values, traditions, language, religion and race, laws and obligations of partner countries. If an action is prohibited by ethical codes of conduct or the law, the relevant action should not be taken.

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In addition, employees are expected to follow up-to-date information on their roles/responsibilities in relation to both the Company's policies and legal obligations, and to exhibit appropriate behavior.

On the other hand, rules, laws or customs announced by any government or legislative body may differ from the Company's ethical values/local laws. In the event of similar situations and if the employee has any doubts about the violation of ethical values, the **Company's Legal Counsel** should be consulted before taking any action.

*The company expects the following from its employees;

- Firstly, to follow and comply with local laws, codes, regulations, regulations and sanctions related to their field of work and the value disciplines they are involved in; and secondly, to follow, recognize, respect and comply with the laws, codes, regulations, regulations and sanctions of the country in which they conduct business activities or communicate,
- With the awareness that local legal requirements are of equal importance with the legal requirements of the country in which commercial activities are carried out; to inform their managers and Legal Counsel in any conflicting situation, and to request legal consultancy services when necessary in order to act in the most appropriate way.

5.3. Relations with Civil Society Organizations

The Company cooperates with associations, foundations or other non-governmental organizations that comply with the law and are transparent about their activities. It can develop projects, undertake sponsorships and make donations with these institutions and organizations, as well as with various legitimate formations such as student communities.

Employees may take part in non-governmental organizations and charity associations outside the Company/represent the Company. In the performance of these duties, it is imperative that employees understand and apply applicable laws and conduct all communications in accordance with the framework established by these laws.

*Company employees are expected;

- To notify the Legal Counsel in case the institution, organization, association or formation engaged in voluntary work makes material and/or moral demands outside the scope of the work at any stage of the cooperation,
- In the work of any institution, organization, association or formation representing the Company, to act in accordance with Klimasan Code of Ethical Conduct, respecting the Company's data confidentiality, protecting and glorifying the brand perception,
- With the awareness of social responsibility; to support the activities of institutions, organizations, associations or formations that overlap with the mission, vision and values of the Company and to

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set an example for their support, to provide feedback and guidance to the Human Resources Department when necessary.

5.4. Press relations

Only persons with full authorization may give written or oral presentations, interviews or information about the Company to the press.

*The company expects the following from its employees;

- When communicating with the media, behave in a manner that is addressed and in accordance with the Klimasan Code of Ethical Conduct,
- To avoid any behavior that may jeopardize the Company's data confidentiality, information security and integrity.

5.5. Public relations

The Company expects its employees to be committed to treating customers, suppliers, competitors and other employees fairly, using common sense, respect and ethical values in all situations. When communicating with the local and/or global community through the press, non-governmental organizations, social responsibility projects, Human Resources process, etc., in any written or electronic way, an honest and fair attitude should be adopted without creating an environment for information security violations.

*Company employees are expected;

- When communicating with the local and/or global community, in any organization where they represent the Company, to act in accordance with and addressed by the Klimasan Code of Ethical Conduct within the scope of transparency and accountability approach.

5.6. Relations with Customers and Suppliers

Business actions must be taken only in the best interests of the company. No employee may use his/her position as an employee to benefit directly or indirectly from any sales, purchases or other company activities. Employees should avoid situations that may create a conflict or conflict between responsibility to the company and self-interest.

*The company expects the following from its employees;

- When communicating with customers, suppliers and business partners; to act in accordance with and addressed by Klimasan Code of Ethical Conduct,
- Not to serve as an officer, director, employee or consultant to any person or organization that does or attempts to do business with the Company or that deals with persons or organizations that make suggestions regarding such business,

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- Not to have any interest in the Company's competitors or in any organization that does or wants to do business with the Company,
- to have no direct or indirect personal interest in any business dealings with the Company (this excludes products and services purchased by the employee as a consumer and where the interest arises out of the employee's relationship or the obligation of the shareholder owner),
- To not provide communication or information services or equipment, directly or indirectly, or as an intermediary in a way that may cast doubt on the impartiality or integrity of the Company,
- To treat all customers, suppliers and business partners of the Company fairly and honestly,
- To increase customer satisfaction and experience by keeping product and service quality at the highest level and doing the necessary work to keep it at the highest level,
- To expect the Company's approach to customer satisfaction and product/service quality to be adopted by all suppliers and business partners and expecting the same dedication from them,
- To take due care in supplier selection and evaluation processes, to make evaluations in accordance with core values and business ethics; to select suppliers that act in accordance with these values,
- To observe the confidentiality of commercial information and using it only for legal transactions; making sure that communication in written or verbal platforms such as tenders, contracts, meetings is accurate and truthful, and staying within the framework of necessary and secure information sharing.

5.7. Fair Competition

The company supports competition on the basis of quality, service and price. The Company conducts all its activities honestly, directly and fairly. It is the Company's fundamental expectation to work in compliance with anti-trust laws and the Company's principle of fair competition.

*The company expects the following from its employees;

- To never discuss with competitors any matter directly related to the competition between the company and the competitor (such as sales price, marketing strategies, market shares, sales policies),
- To never collude with a competitor to limit competition by fixing prices, sharing markets and/or otherwise,
- To never insist that customers purchase and/or promote a product or service they do not want,
- To never engage in industrial espionage or commercial espionage,
- To act honestly, accurately and in accordance with Klimasan Code of Ethical Conduct and addressed in all their relations with customers,
- To represent accurately the quality, features and availability of the Company's products and services.

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5.8. Internal Competition

Similar to competition between companies, competition between employees for continuous improvement is inherent in business life and working conditions. With this awareness, the Company offers its employees opportunities such as promotion, change of position, change of department, specialization and while competing for these opportunities, the Company requires its employees to recognize each other's rights and to act in accordance with business ethics in a fair competitive environment.

*The company expects the following from its employees;

- To avoid unfair competition when competing within the company, to act within the framework of ethical rules by considering fair competition conditions and to act in accordance with and addressed by Klimasan Code of Ethical Conduct during the promotion or position change in question

5.9. Fighting Bribery and Corruption

The Company has absolutely no tolerance for bribery and corruption, therefore it is very important that employees adopt fair competition practices. The Company does not offer, pay or accept bribes or kickbacks for any purpose, directly or through a third party.

*The company expects the following from its employees;

- Strictly not to make facilitation payments, not to make offers or requests; to notify their managers, Human Resources Department or Ethics Line if they are offered,
- To notify the Legal Consultant, managers, Human Resources Department or Ethics Line for the evaluation of the commercial partnership in cases that may constitute a violation arising from the suppliers,
- To ensure that all sponsorships and donations are duly approved and paid for in accordance with their purpose,
- To comply with anti-bribery and anti-corruption laws and Company policies and procedures that prevent bribery and corruption.

5.10. Harassment-Free Work Environment

The Company **does not condone** any form of **harassment** or **abuse** . Harassment can take many forms, such as **verbal** expressions, **physical approaches**, **psychological pressure** or **visual displays** . Offensive, discriminatory and discriminatory actions are considered within this scope.

This includes all forms of **sexual harassment** . No physical, sexual discrimination and harassment, racist, psychological or verbal harassment, inappropriate and humiliating sexist jokes and discourse, physical or verbal violence and no **mobbing attempts** are tolerated.

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Feedback, objections and criticism should always be given in an **appropriate** and **respectful manner** . Employees are expected to act in consideration of cultural differences and sensitivities at all times they are in contact with other employees.

*The company expects the following from its employees;

- To be aware of the Company's attitude towards all kinds of harassment, to give feedback to the Human Resources Department, Ethics Line or managers in case of any witness or suspicion that this attitude is violated,
- To take into account the "Doing the Right thing" section specified in the document for feedback,
- To never remain silent on their own behalf or on behalf of another employee, knowing that they are safe and protected by the Company, aware that every report is of high importance and that definitive actions will be taken.

5.11. Respecting Differences

The Company treats all kinds of differences with **respect** regardless of religion, language, race, gender, sexual orientation, age, political orientation, marital status and operates with this understanding in the entire value chain/ business discipline. The **principle of equality** in working conditions is adopted throughout the Company.

*The company expects the following from its employees;

- When communicating with all internal and external stakeholders, to act in accordance with and addressed by Klimasan Code of Ethical Conduct,
- To be respectful, measured and polite to all internal and external stakeholders working or communicating with each other,
- Strictly not to act disrespectfully, bully, intimidating, aggressively or maliciously, to make a notification in accordance with the directions in the "Doing the Right" section specified in the document when they encounter a violation in question,
- Managers and the Human Resources Department's to make decisions on the recruitment, selection and development of employees based on objective criteria such as qualifications, skills, merit and experience, and to ensure that no differences determine employment, rights and internal treatment.

In line with the company's promotion and career development policies, which are generally outlined by rules, no discrimination, especially sexual discrimination, is acceptable for a deserved promotion. This policy of the Company is secured by the "Klimasan Recruitment Policy".

5.12. Conflict of Interest

There are many situations that may lead to conflict of interest in many areas of business life. The most common are accepting gifts from suppliers, working for another company, owning a significant part of

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another company or business, close or familial relationships with external suppliers, and communications with competitors. A potential conflict of interest arises for employees who make decisions in their work that may offer favors to a client in exchange for anything that benefits them or their friends and family. Such situations may impair the employee's ability to make decisions that are in the sole interest of the Company. The Company avoids relationships, influences or activities that undermine its ability to make fair and impartial decisions in the conduct of its business.

*The company expects the following from its employees;

- When faced with a situation that may cause personal interest or benefit, to act in accordance with and addressed by Klimasan Code of Ethical Conduct and to take the document as a guide,
- When there is or may be a conflict of interest, report it to the Human Resources Department, their immediate manager or the Ethics Line,
- To never use non-public information for personal gain or benefit, or communicate such information to any other person (inside or outside the company) who does not have a legal requirement to do so,
- Not to engage in any sharing, close relationship, agreement or dialog with any supplier and/or customer for personal gain or benefit, which may be to the detriment of the Company; to act with the awareness that this situation also applies to family members or close friends.

5.13. Information Security and Privacy of Personal & Company Information

Care should be taken to **protect personal, Company and/ or 3rd party information**, to encrypt confidential or private information when handling it and to **share it only with authorized persons**.

Personal information of employees and business partners is processed to the extent permitted by the legislation to improve the company's activities. Employees who are responsible for processing personal data **are obliged** to act in accordance with the Company's corporate policies, especially the legislation on the protection of personal data, to collect, use and process this information only for legitimate business purposes, to obtain consent from individuals as required by the relevant legislation, to correct incorrect information when requested, to keep personal data up to date by respecting individual legal rights, to limit access to information to persons authorized to see this information, and to **keep** personal data **confidential and secure**. It is forbidden to share this information with persons who do not have the authority and need to know the information.

*The company expects the following from its employees;

- To act in accordance with both the legislation and the rules determined by the Company regarding information security, to convey any concerns regarding information breaches to the Company's Information Technologies Department without delay; in cases where it is not known what to do, to take this document as a reference and to consult the Company's Legal Counsel,

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- To treat all internal and external stakeholders of the Company with respect regarding the confidentiality and protection of personal information,
- To create, record, process, retain and transfer personal information only in accordance with applicable laws,
- Not to access personal and/ or Company data and information or disclose this information to anyone inside or outside the organization unless the disclosure of personal information is in accordance with the applicable laws and Company principles.

5.14. Insider Trading

It should be known that it is a legal offense, including but not limited to the Capital Markets Law (in the nature of insider trading), to try to obtain any commercial benefit, including direct or indirect share trading on stock exchanges, by using any confidential information belonging to the Company or giving it to third parties, and should never be attempted.

*The company expects the following from its employees;

- Never to take out confidential information and documents and works such as projects, regulations, etc. that they have due to their duties when leaving the Company and/or during their employment,
- Not to perceive the personal and / or corporate information and data of the Company or any of the Company's stakeholders, their work as a commercial element in any way and not to see it as a commercial element, and to act with the awareness of the sanctions that may be applied in case of violations,
- To act with the awareness that information trafficking is a legal offense and report any concerns about violations to their managers, the Human Resources Department or the Ethics Line.

5.15. External Business Acquisition

Acquiring external business may conflict with the interests and benefits of the Company in many respects. In such cases, considering the Company's understanding of "Conflict of Interest" and the purposes of this document, employees should prioritize the interests of the Company and should not take any job outside the Company due to information security and/or conflict of interest.

5.16. Recruitment of Relatives

As addressed in the Klimasan Recruitment Policy, relatives of employees are not employed by the Company due to the grounds that they may create **a conflict of interest**. The Company is obliged to carry out the process with care and diligence in order to prevent the conflict of interest in question here.

*The company expects the following from its employees;

- To be aware of the attitude and approach regarding the recruitment of relatives as stated in the Klimasan Recruitment Policy,

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- In the event that a family member works for a customer, supplier or subcontractor with whom Klimasan is or will be in cooperation, or for an official institution that has the potential to have an impact on Klimasan's activities, to report this situation to the Internal Audit Department, Legal Department or Human Resources Department and submit it to the Company's evaluation.

5.17. Gifts and Entertainment

Under no circumstances should **gifts** or **hospitality** be accepted that could influence an employee's decisions. In particular, employees should avoid any interest or benefit from suppliers that would normally lead them to grant privileges to that supplier.

It is a violation of the Code for an employee to solicit or encourage a good or service from a supplier, regardless of its value, no matter how small. Suppliers will only maintain confidence in the Company's impartiality and integrity if all employees take this guidance seriously.

Declaration of Gifts: An employee who inadvertently receives a gift prohibited by these guidelines, either for himself/herself or a family member, must immediately notify his/her manager in writing and return the gift to the giver or report it to the Company's Human Resources Department for distribution to non-profit organizations.

Discounts An employee may only accept discounts for individual purchases of supplier or customer products if such discounts do not affect the company's purchase price and are generally offered to others who have a similar business relationship with the supplier or customer.

Business Meetings: Hospitality or services provided by a supplier or customer may be accepted by an employee if it is associated with a business meeting and the customer or supplier provides it to others as a normal part of business. Examples of such hospitality or services include: transportation to or from the supplier or customer's place of business, hospitality venues, accommodation at the supplier's or customer's place of business, and business meals when business visitors visit the customer or supplier's place of business. The services should be of the type normally used by company employees and in line with the company's expense accounting.

*The company expects the following from its employees;

- Not solicit or accept compensation, advances, gifts, hospitality or other gratuities (other than from financial institutions on the same basis as customers) from an existing or potential customer or supplier in excess of the trail value or at a rate that the employee cannot recover under normal expense accounting procedures.

5.18. Occupational Health and Safety

The Company prioritizes the **health and safety** of its employees, business partners, subcontractors, suppliers, customers and the community. In this context, the Company takes measures to provide its employees with healthy and safe working conditions and to achieve the "**Zero Accident**" target.

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The Company implements the requirements of the ISO 45001 Occupational Health and Safety Management System at every stage of the organization and value chain, and expects all relevant stakeholders to observe, prioritize and act in accordance with their own and each other's health and safety.

*The company expects the following from its employees;

- To use personal protective equipment (PPE) in operational areas,
- Always to work in an environment where health and safety conditions are ensured; stop working in a working environment that is considered unsafe and notify the Occupational Health and Safety Team,
- To participate in the planned information and awareness trainings, to request training if they think that they do not have sufficient knowledge and competence,
- To report accidents that have occurred or may occur, thus, to play a supportive role in taking lessons from them by eliminating risk or inconvenience,
- To work in harmony with the Occupational Health and Safety Team, to be cooperative to take the necessary action in case of identified risks.

5.19. Environmental Sustainability

In all its activities, the Company acts in accordance with the provisions of **environmental legislation** within the framework of the principle of **social responsibility**. It determines the company procedures to be followed in this regard and ensures that employees comply with them. Employees are obliged to comply with the company's policies and procedures regarding environmental protection and to report any violations to their managers as soon as possible. All stakeholders are expected to maintain their existence with the same care and sense of responsibility and in compliance with environmental laws and regulations.

*The company expects the following from its employees;

- To fulfill the necessary duties and responsibilities for the continuity of compliance with legal environmental legislation,
- To be conscious about the efficient consumption of natural resources, energy saving, emission reduction, biodiversity,
- To demonstrate the necessary dedication to achieve the company's goals within the scope of environmental sustainability and to successfully complete the work and projects carried out,
- To ensure waste separation at source, support waste reduction efforts and act with recycling awareness in order to live and maintain a clean environment,
- To participate in planned information and awareness trainings, and request training if they feel they do not have sufficient knowledge and competence.

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KLİMASAN ETHICAL CODE OF CONDUCT AND PRINCIPLES OF PRACTICE RECOGNITION FORM

I hereby declare and undertake that I have read and understood all articles of the Code of Ethical Conduct and Implementation Principles Document and that I agree to comply with the specified rules of conduct in accordance with the legal legislation of the Republic of Turkey and that I will immediately make any legal notification regarding this matter to Human Resources, internal audit, legal units and the ethics line.

Employee's Name and Surname :

Registration Number:

Date :

Signature:

This page is issued in duplicate. A copy is kept in the employee's personnel file.