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## GÜLSAN HOLDING ETHICS POLICY

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*Gülsan Holding has established itself as a leader in its sector through innovation and adherence to core principles. To maintain our success and competitiveness, and to balance micro and macro scale interests, we operate in strict alignment with ethical values. We are committed to a fair, ethical, and honest approach, considering the needs of our employees, stakeholders, and third parties.*

1. Operates in strict adherence to relevant national and international legal standards, ensuring fairness, ethical conduct, and honesty in all activities.
2. Prohibits any form of corruption, fraud, embezzlement, bribery, or illegal behaviour in all business relationships and transactions.
3. Upholds every employee's right to express themselves within the bounds of laws and regulations.
4. Guarantees non-discrimination and equal opportunities, rights, and benefits for all employees. Bases employment and promotion decisions solely on business capability, rather than race, colour, language, religion, ethnicity, political opinion, marital status, age, pregnancy, or gender.
5. Respects the dignity and personality of each employee. Prohibits verbal, physical, or psychological harassment and coercion.
6. Employs individuals based on lawful, documented contracts.
7. Ensures fair compensation, including regular and overtime payments as legally mandated
8. Adheres to legal requirements regarding working hours.
9. Does not employ forced, involuntary, or child labour. Does not employ anyone below the legal minimum age.
10. Prohibits the use of slave, illegal, or involuntary labour
11. Ensures no employees are under the age of 18.
12. Provides special protections for employees with disabilities or special conditions, in compliance with applicable laws and provisions.
13. Respects employees' rights to join and participate in non-governmental organizations within the legal framework. Guarantees that no employee is dismissed or pressured due to their membership in any lawful non-governmental organization or association.
14. Prevents work-related accidents and occupational diseases by ensuring safe and healthy working conditions and actively works to minimize health and safety risks. Conducts risk assessments and implements all necessary measures to eliminate or mitigate these risks. Maintains a healthy and safe working environment.
15. Takes measures to prevent environmental degradation. Prevents environmental pollution by managing waste through licensed companies. Complies with current environmental legislation and conducts activities in a manner that prevents pollution, minimizes impact, and adheres to environmental dimensions and impact assessments.
16. Adopts a sustainable production approach that conserves energy and raw materials while striving for maximum efficiency.
17. Ensures data security for employees and commercial partners by adhering to relevant laws, regulations, standards, and contracts.
18. Avoids the use of substances or chemicals harmful to human health in its products. Produces products in accordance with international standards and relevant laws and regulations.
19. We publish our Ethics Policy on our website to inform, raise awareness, and engage all our stakeholders.
20. While all employees play a crucial role in the effective implementation of the Ethics Policy, ultimate responsibility rests with the Sustainability Committee.
21. The Board of Directors ensures the provision and continuity of the resources necessary for the implementation of this policy
22. We are committed to reviewing our policy at least annually and making necessary updates and improvements.

***Chairperson of the Board of Directors***

*Mustafa TOPÇUOĞLU*

*25.09.2023*