

Tosyali ethical rules

1. Foreign Relations

1.1 Communication with stakeholders

- Represent Tosyali Algeria, our group companies and the brands we own in a way that does not harm their reputation in front of the community and increases it.
- Address criticisms and recommendations while keeping open channels of communication with stakeholders and ensuring the continuation of positive relationships.
- Avoid personal reactions when it is necessary to share points of view with the public.

1.2 Compliance with law and legal procedures

- Adopt the principle of acting in accordance with all laws, rules and regulations in the countries where we operate.
- Manage, record and report all business operations and accounting systems completely and properly, in accordance with law.
- Ensure that agreements entered into with third parties and institutions comply with all relevant laws, regulations and ethical rules and are clear and understandable.

1.3 Customer relations

- Create value for customers and meet their demands and needs at the highest level.
- Provide quality products and services and follow stable policies.
- Be professional and fair in dealing with customers, within the framework of courtesy rules.
- Protect customer personal information and confidentiality in accordance with applicable laws.
- Do not provide customers with misleading or incomplete information.

1.4 Relations with suppliers

- Thoroughly and carefully select suppliers to work with, ensuring that they have not committed unethical or illegal acts.
- Encourage suppliers to respect their legal obligations, to act with respect for human rights and to behave in accordance with the principles of business ethics and the fight against corruption.
- Make supplier selection decisions based on objective criteria.
- Respect the rules of reasonable confidentiality and workplace safety during inspections and visits to suppliers.

1.5 Relations with competitors and competition

- Not enter into agreements or engage in conduct intended to prevent, erode or restrict competition beyond what the law permits.
- Do not abuse dominant position in a particular market.
- Do not participate in meetings or exchange of information aimed at identifying competitors and market conditions.
- Inform superiors if confidential information about competitors is obtained.

2. Rules of ethical behavior that employees must follow.

It is the responsibility of all employees to maintain and promote the reputation of Tosyalı Algeria, our group companies and the brands they own with trust, honesty and professionalism. In this context, here are our expectations of our employees:

- Always comply with the law.
- Perform their functions within the framework of fundamental moral and humanitarian values.
- Act with fairness, good faith and understanding to ensure mutual benefits in all their dealings.
- Never unfairly provide advantages, whatever the reason, to any person or institution; never accept or provide bribes; prevent such actions to the extent of their knowledge and act in accordance with anti-corruption rules;
- Comply with all enforcement rules that support relevant rules of business ethics and these rules as part of their responsibilities, not engage in behaviors that may prevent other employees from performing their jobs as required in this area and not disrupt the harmony of work;
- Not make payments for facilitation purposes (payments to public officials with the aim of expediting or facilitating routine authorizations and services which are not likely to be appreciated, such as visa processes, customs clearance of goods, security or telephone services),
- Do not engage in any conduct or correspondence that could bind the Company without authorization.
- Protect company assets, including information and information systems, from loss, damage, misuse, theft and potential sabotage.
- Do not directly or indirectly use working time or company resources for personal or political purposes.
- Keep salaries, salary benefits and future regulations confidential.

3. Information security

All company regulations, commitments and guidelines regarding information security are considered complementary to the following articles:

3.1 Intellectual property rights

- Ensure legal and timely protection of intellectual property rights of newly developed products, processes and software.
- Avoid unauthorized use of patents, copyrights, trade secrets, trademarks or other intellectual property rights owned by other companies.
- Take necessary steps to protect the company's rights in situations involving the sharing of confidential information related to intellectual property rights.

3.2 Information management

- Ensure the proper preservation and archiving of all records within their legal periods.
- Do not respond to requests for confidential information without company approval.
- Provide truthful statements and reports.

3.3 Security and crisis management

- Take necessary measures to protect company employees, information and information systems from potential terrorism, natural disasters and malicious attempts.
- Develop crisis plans for handling emergency situations such as terrorism, natural disasters, etc., and thereby ensuring business continuity with minimal loss.
- Take all necessary measures to prevent theft of company assets.

3.4 Confidentiality

- Protect financial and trade secrets, information that could harm the competitive strength of companies, employee rights and agreements with business partners as “confidential”.
- Do not share work-related information with unauthorized parties.
- Do not use non-public company and customer information beyond its intended purpose or without proper authorization.

3.5 Use of social media

- Do not share unauthorized company information on social media or other platforms.

4. Ethical Business Practices

4.1 Avoid conflicts of interest

- Avoid situations creating conflicts of interest in current positions and responsibilities due to political activities.

4.2 Do not work for your own benefit or that of your loved ones

- Do not grant unfair advantages to yourself, your loved ones or third parties.
- Avoiding conflicts of interest in personal investments.
- Ensure that personal investments do not interfere with professional responsibilities.

4.3 Representation and participation in event invitations

- Obtain approval for participation in influential events other than activities open to general participation.

4.4 Those who left the company

- Act in the best interests of the company before and after leaving the company.
- Avoid conflicts of interest before or after departure.
- Inform superiors if relatives have interests in a company engaged in a commercial relationship.

4.5 Sharing and trading of internal information (insider trading)

- Do not engage in insider trading.
- Protect confidentiality even after leaving the company.

4.6 Fight against corruption and Bribery

- Tosyalı Algeria and its group companies are committed to fighting corruption and bribery.
- Comply with anti-corruption laws.
- Ensure that all payments to suppliers are linked to services/products and not bribes.

4.7 Receiving and giving gifts

- Any relationship likely to give the impression of providing unfair material advantages or of creating a conflict of interest is strictly prohibited.
- All interactions must be transparent and fair.
- Any form of gift or donation that could compromise our integrity or impartiality is strictly prohibited.

5. Occupational Health and Safety

- Ensuring the health and safety of workers in the workplace.
- Avoid possessing substances that could threaten the workplace or workers.
- Do not possess or use narcotics or substances that impair mental or physical abilities, except with valid medical certificates.

6. Civil Society Institutions and Political Activities

- Avoid situations creating conflicts of interest due to political activities.
- Do not use the company name or resources for personal political purposes.
- Avoid political propaganda and campaigning during working hours.

7. Rules of Ethical Behavior Principles of Implementation

- Obligation to notify violations and report concerns.
- Protect employees reporting violations from retaliation.
- Notify superiors if you suspect ethical violations.
- Report concerns through the Ethics Line (etik@tosyaliholding.com.tr).
- Ensure confidentiality and objectivity in the reporting and investigation process.

7.1 Reportable violations or inappropriate behavior :

- Environmental, health and safety issues.
- Workplace conflicts and abuse of position.
- Violation of information protection and data confidentiality.
- Threats and physical violence.
- Violations of internal and external legislation.
- Suspicions of human rights or labor rights issues.
- Criminal elements such as bribery, corruption and security abuses.
- Providing or receiving unfair personal advantages.
- Disclosure of Confidential Information.
- Managers use employees for personal gain.
- Unfair performance evaluation.
- Unequal treatment of employees.
- Negligence or abuse of power

8. Rules Ethics for the Environment :

Tosyalı Algeria and its group companies are committed to reducing their impact on the environment. Employees must follow these rules:

- Reduce, reuse and recycle resources wherever possible.
- Comply with all environmental laws and regulations.
- Report any environmental concerns or violations immediately.
- Save energy and water resources.
- Reduce waste generation and dispose of waste properly.
- Use environmentally friendly products and technologies when possible.
- Encourage environmentally friendly practices at work and in daily life.
- Participate in environmental training and awareness programs.

8.1 Sustainable sourcing

Tosyalı Algeria recognizes the importance of responsible sourcing and sustainable sourcing practices. Employees must:

- Sourcing materials and products from suppliers who respect environmental standards
- Prioritize suppliers with sustainable and ethical practices.
- Consider environmental impact when selecting suppliers.
- Support initiatives in favor of responsible and sustainable sourcing.
- Continuously assess and improve supply chain sustainability.

8.2 Pollution prevention

Tosyalı Algeria is committed to preventing pollution and minimizing its environmental footprint. Employees must:

- Identify and report any potential source of pollution.
- Implement pollution prevention measures in their work.
- Avoid activities that could harm air, water or soil quality.
- Promote environmentally friendly transportation options.
- Reduce emissions and use of harmful substances.
- Support initiatives aimed at reducing environmental pollution.

8.3 Conservation of biodiversity

Tosyalı Algeria places importance on biodiversity and natural ecosystems. Employees should:

- Protect and preserve local flora and fauna.
- Minimize impacts on natural habitats.
- Participate in conservation efforts as part of company operations.
- Raise awareness among colleagues and stakeholders about biodiversity.
- Participate in community conservation projects when possible.

8.4 Environmental reporting

Tosyalı Algeria aims for transparency in environmental reporting. Employees must:

- Accurately report environmental data and performance.
- Provide timely updates on environmental initiatives and improvements.
- Share environmental information with stakeholders and the public when necessary.
- Encourage open dialogue on environmental issues.

8.5 Sustainable transportation

Tosyalı Algeria encourages sustainable transportation choices. Employees must:

- Use public transportation, carpooling or teleworking when possible.
- Opting for energy-efficient and low-emission vehicles for business purposes.
- Support environmentally friendly travel initiatives.
- Reduce work-related travel whenever possible.

8.6 Energetic efficiency

Tosyalı Algeria is committed to reducing energy consumption. Employees must:

- Turn off lights, equipment and appliances when not in use.
- Use energy-efficient lighting and appliances.
- Report wasted energy or inefficiencies.
- Promote energy conservation in the workplace.

8.7 Water conservation

Tosyalı Algeria aims to conserve water resources. Employees must:

- Report water leaks and waste.
- Use equipment and devices with low water flow.
- Promote responsible water use among colleagues.
- Support water conservation initiatives.

9. Ethical Rules for Recruitment

Tosyalı Algeria aims to emphasize commitment to equal employment opportunities, skills development, respect for human rights, eradication of child labor and gender equality within the organization:

- Do not discriminate in the recruitment process based on factors such as race, gender, religion, age, disability or any other protected characteristic.
- Ensure that all candidates receive equal opportunities and fair treatment during the recruitment process.
- Provide training and development opportunities to employees to improve their skills and promote awareness of sustainability in the workplace.
- Encourage a growth mindset among employees, fostering a culture of continuous learning and improvement.
- Strictly prohibit forced or compulsory labor in all its forms within the organization.
- Eliminate discrimination in all aspects of employment, including recruitment, promotion and treatment of employees.
- Ensure compliance with internationally recognized human rights and labor standards at all times.
- Formally prohibit the employment of child workers within the organization.
- Collaborate with relevant authorities and organizations to identify and eradicate child labor in the supply chain.
- Provide fair wages to all employees, ensuring that compensation is based on merit and not influenced by gender or other discriminatory factors.

- Promote and ensure gender equality in the workplace, providing equal opportunities and addressing gender-related pay and advancement disparities.

10. Ethical Rules for Responsible Sourcing:

These ethical rules are designed to respect commitments linked to responsible sourcing

- Treat all suppliers fairly and transparently in procurement processes.
- Avoid any form of discrimination or bias in the selection of suppliers.
- Ensure that the origin and route of materials used in production are traceable and well documented.
- Implement measures to monitor the environmental and social impact of sourced materials.
- Strive to reduce the social and environmental impacts associated with product transportation.
- Explore and adopt sustainable transportation practices, such as reducing emissions and optimizing logistics.
- Prioritize sourcing raw materials from suppliers located as close as possible to manufacturing facilities.
- Aim to minimize the distance between the source of raw materials and the factory to reduce the carbon footprint.
- Implement strategies to minimize the environmental impact of transporting materials, goods and employees.
- Promote environmentally friendly transportation options and optimize travel routes.

11. Ethical Rules for Contribution to the Local Economy.

These ethical rules are designed to respect commitments related to contributing to a diversified local economy

- Actively increase purchases of local products and services.
- Support local businesses and suppliers whenever possible.
- Collaborate with local communities and their representatives throughout the development, operation and closure of projects.
- Participate in initiatives that have a positive impact on the well-being and development of the local community.
- Strive to create a positive impact in the communities where the company operates.
- Invest in projects and activities that improve the quality of life in these communities.
- Prioritize hiring from the local community to provide employment opportunities.
- Support skills development and training programs for local residents.