

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

CONTENTS

1. PURPOSE AND SCOPE	2
2. DEFINITIONS	2
3. CODE OF ETHICS AND BUSINESS PRINCIPLES	3
3.1. Honesty	3
3.2. Confidentiality and Protection of Confidential Information	3
3.3. Avoiding Conflicts of Interest	5
3.3.1. Making Transactions in Favor of Oneself and Their Relatives:	6
3.1.2. Accepting and Giving Gifts:	7
3.1.3. Political Activities	7
3.3.4. Those Who Quit Their Jobs Doing Business with the Batı Anadolu Group:	8
4. RESPONSIBILITIES	9
4.1. Legal Responsibilities	9
4.2. Responsibilities Toward Customers	9
4.3. Responsibilities Toward Employees	9
4.4. Responsibilities Towards Suppliers / Business Partners:	13
4.5. Responsibilities Towards Competitors:	14
4.6. Responsibilities Towards Environment, Society and Humanity	14
4.7. Responsibilities towards the “Baati Anadolu Group”	15
5. RESPECT AT WORKPLACE AND BUSINESS LIFE	16
5.1. Acting Respectfully and Considerately in Relationships with Others	16
5.2. Attitude/Behavior and Appearance	18
5.3. Ensuring Intra-Company Hierarchy	19
5.4. Attendance Required	20
5.5. Sharing Information with Colleagues - Transfer/Delivery Obligation	20
6. APPLICATION	20
6.1. Ways and Methods to Follow When Making Ethical Decisions	20
6.2. Duties and Responsibilities	21
6.2.1. Duties and Responsibilities of Employees	21
6.2.2. Duties and Responsibilities of Code of Ethics Consultants	22
6.2.3. Duties and Responsibilities of Managers	23

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

6.2.4. Other Responsibilities	23
6.3. Notification and Resolution of Non-Compliance with the Code of Ethics	24
6.3.1. Ethics Committee Organization	24
6.3.2. Responsibility of the Ethics Committee	25
6.3.3. Application to the Ethics Committee	25
6.3.4. Evaluation of Applications	25
6.3.5 Working Principles of the Ethics Committee	26
6.3.6. Collection of Evidence	28

1. PURPOSE AND SCOPE

The purpose and scope of these Rules of Business Ethics and Working Principles (“**Rules of Business Ethics and Working Principles**”); Batı Anadolu Çimento Sanayii A.Ş. and its subsidiaries over which it has direct and indirect control (“**Batı Anadolu Group Companies**”) and all third parties and employees acting on their behalf, to determine the ethical standards, rules of conduct and business principles. The purpose of this Code of Business Ethics and Working Principles is to establish expectations, standards and ethical practices that form the basis of all business relationships and transactions, to prevent any disputes and conflicts of interest that may arise, to strengthen the culture of Batı Anadolu Group Companies, to ensure reliability and to achieve sustainable success provides guidance.

2. DEFINITIONS

Ethic:

Ethics is a concept used to evaluate right and wrong, good and bad, fair and unfair, and to make correct decisions based on these evaluations. Ethics is a discipline that helps determine the values and standards of behavior of individuals and societies. This includes principles for living a righteous, just and honest life on a personal and social level.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

Business Ethics:

Business ethics refers to a field used to determine and enforce correct and fair behavior in the business world. Business ethics aims to ensure that individuals, companies and organizations in the business world behave in accordance with ethical values. This includes principles such as honesty, transparency, fair competition and respect for the rights of third parties.

Code of Ethics:

It is a guide that determines the standards of ethical behavior among the employees, managers and business partners of Batı Anadolu Group Companies. These rules reflect the company's values, commitments and responsibilities, shaping the way it does business and its corporate culture.

Secret information:

It expresses the meaning given to it in article 3.2.

3. CODE OF ETHICS AND BUSINESS PRINCIPLES

3.1. Honesty

Batı Anadolu Group Companies are based on the principle of honesty in all internal and external relationships and business processes and act with integrity and honesty in their relations with their employees and all third parties they come into contact with or interact with within the scope of their activities.

3.2. Confidentiality and Protection of Confidential Information

Information is one of the most important assets that companies will benefit from in achieving their goals. It is the common responsibility of every employee of Batı Anadolu Group Companies to use information effectively, share it correctly and ensure the confidentiality, integrity and accessibility of information in this process.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

“Confidential Information” includes the intellectual and industrial property rights of Batı Anadolu Group Companies and all kinds of innovations, as well as databases, printed communication materials, business processes and business plans (marketing, product, technical) written, developed or implemented by the employee, Business strategies, information regarding strategic partnerships and partners, financial information, personnel rights information, personal data of our employees, customers and stakeholders, information that we are obliged to protect within the framework of "confidentiality agreements" made with third parties, and all similar written, verbal, graphic or readable information. represents information.

3.3. Application basics

Batı Anadolu Group Companies employees must be sensitive to and comply with regarding Confidential Information are stated below.

- Confidential Information cannot be disclosed to third parties unless disclosure is mandatory in accordance with judicial decisions and legislation.
- Confidential Information must not be altered, copied or destroyed. Necessary precautions are taken to ensure that the information is kept carefully, stored and not disclosed. Changes to the information are recorded with a history.
- Confidential Information and documents should not be taken outside the institution. In cases where it is necessary to be taken out of the institution, the approval of the person responsible for the information and the top manager of the relevant superior unit must be obtained, and in any case, before information is shared, a contract, undertaking or similar document must be signed with the third party to whom information will be shared, in which the relevant third party undertakes to keep this information confidential.
- Passwords, user codes, authorizations and similar identifying information used to access company information systems should be kept confidential and should not be disclosed to anyone other than authorized users.
- Confidential Information: dining hall, elevator, service cars, etc. It should not be spoken in public places.
- If information is shared with third parties and/or organizations for the benefit of Batı Anadolu Group Companies, a confidentiality agreement within the scope stated above is first signed for information sharing in order to ensure that these persons and organizations understand

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

their responsibilities regarding the security and protection of the shared information. It is essential to obtain legal support in these applications.

- All official statements must be announced to stakeholders and the public in an equitable, complete, simultaneous and understandable manner, through the authorized units or the Public Disclosure Platform (KAP), as the situation requires.
- Unfounded statements and/or gossip cannot be made about individuals or institutions.
- Wages, fringe benefits, etc. for personnel that reflect the policy of Batı Anadolu Group Companies and are personalized. Personal information is confidential and should not be disclosed to anyone except authorities. Employee information is sent individually. Employees cannot disclose this information to others or pressure other employees to disclose the information.
- Even if it is not stated in writing that it is confidential, the confidentiality of all information and documents specified in the description must be protected, and this responsibility of our employees continues during their employment at Batı Anadolu Group Companies and in case they leave their jobs.

3.4. Avoiding Conflicts of Interest

Conflict of interest is a situation that indicates the potential for a person or institution to obtain personal or corporate benefits by improperly using their status.

Batı Anadolu Group Companies employees aim to stay away from relationships and situations that may involve potential or actual conflict of interest and act in the interest of Batı Anadolu Group Companies. Batı Anadolu Group Companies employees benefit from their current positions; He does not obtain personal benefits from individuals and organizations with whom he has business relations, personally, through his family or relatives.

Batı Anadolu Group Companies employees avoid using the Batı Anadolu Group Companies power and/or name, Batı Anadolu Group Companies identity, for personal benefit.

In case of a potential conflict of interest, when it believes that the interests of the relevant parties can be safely protected through legal and ethical methods, it applies these methods as part of its commitment. In cases of doubt, the Batı Anadolu Group Companies employee should contact his

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

manager, the Human Resources Department (“ Human Resources ”), the Ethics Rules Advisor who is the top manager of the Human Resources business unit (“ Ethics Rules Advisor ”), and the Batı Anadolu Group Companies Ethics Committee (“ Ethics Committee”).

3.4.1. Making transactions in favor of oneself and one's relatives:

Batı Anadolu Group Companies employees benefit from their duties; It is essential that the Company does not obtain personal benefit from the persons and organizations with which it has business relations, personally, through its family or relatives, and does not use the name of Batı Anadolu Group Companies for personal benefit.

Managers and Human Resources recruitment officers who have to make decisions in the recruitment processes must take measures to eliminate the conflict of interest if they are in a spouse or first-degree relative relationship with a candidate who has applied for a job. These measures can be achieved by involving alternative human resources officers who do not have a conflict of interest.

In a way that would constitute a conflict of interest, employees of Batı Anadolu Group Companies must not have financial interests, including their spouses and first-degree relatives, in any organization that has a rival, supplier or customer relationship or is trying to do business. It is essential that the employees of Batı Anadolu Group Companies do not have partnership, board membership, consultancy or employee relations with these organizations.

It is essential that the employees of Batı Anadolu Group Companies do not engage in work that requires them to be considered as 'traders' or 'tradesmen', directly or indirectly, and do not work for another person and/or institution, under any name, during or outside working hours, for a fee or similar benefit.

In cases that may cause a conflict of interest, employees are required to consult their managers and the human resources unit.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

3.4.2. Accepting and Giving Gifts:

Bati Anadolu Group Companies employees and managers cannot offer or accept gifts in their relationships with public employees, customers, suppliers, contractors and other business and solution partners in situations that may lead to or be perceived as a conflict of interest.

Bati Anadolu Group Companies employees and managers should under no circumstances accept gifts with a monetary value exceeding 50.00 (fifty) USD. When faced with such a situation, the relevant manager or employee should politely reject the gift and state that they cannot accept it.

The total value of gifts accepted from various sources within a calendar year must not exceed 250.00 (two hundred and fifty) USD. Our company's employees must fill out the "Gift Acceptance Declaration Form" (Annex-1) and submit it to the Human Resources Directorate for each gift they accept with a value not exceeding 50.00 (fifty) USD. These Gift Acceptance Declaration Forms will be kept in the personnel file of the relevant person.

All corporate support and sponsorship requests regarding the activities of Bati Anadolu Group Companies are forwarded to the Corporate Communications unit of Bati Anadolu Group Companies. These submitted requests are evaluated objectively by the Corporate Communications unit and presented to the Bati Anadolu Group Companies Executive Board (“ **Executive Board** ”). Sponsorship support is provided after the approval of the Executive Board.

Giving, receiving or offering bribes and/or kickbacks is unacceptable under any circumstances.

3.4.3. Political Activities

Engaging in political activities is a constitutional right as well as an internationally recognized human right. Bati Anadolu Group Companies respect the right of its employees to individual and voluntary participation in legal political activities arising from the constitution. However, employees should perform these activities outside working hours and avoid using company resources for political activities.

Bati Anadolu Group Companies are not party to any political views or ideology. Its resources cannot be used to support political parties and candidates, and promotional and donation activities cannot

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

be carried out in support of a political movement. Propaganda activities of political parties and candidates are not allowed at Batı Anadolu Group Companies locations.

Employees of Batı Anadolu Group Companies must observe the following conditions in the political activities they engage in individually and voluntarily:

- Employees must avoid situations that may create a conflict of interest in their current duties and responsibilities due to the political activities in which they are involved.
- The company name, title within the company and resources belonging to Batı Anadolu Group Companies cannot be used in political activities carried out individually.
- Political propaganda cannot be made during working hours and the workplace environment, employees cannot be asked to become members of a political party in any way, and other employees' time cannot be taken for these activities.

3.4.4. Retired Managers and Employees Doing Business with Batı Anadolu Group Companies:

In order for managers and employees who leave Batı Anadolu Group Companies to work as salesmen, contractors, consultants, brokerages, representatives, dealers or similar companies in Batı Anadolu Group Companies;

- No disciplinary record in previous employment and
- There should be no conflict of interest due to the duties he/she has undertaken during his/her previous employment.

Provided that these conditions are met, in order for those who leave their jobs to do business with Batı Anadolu Group Companies, a report prepared by the manager of the relevant unit must be approved by the Ethics Committee.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

4. RESPONSIBILITIES

Batı Anadolu Group Companies, in addition to their legal responsibilities; It takes care to fulfill the following responsibilities towards customers, employees, shareholders, suppliers and business partners, competitors, society and individuals:

4.1. Legal Responsibilities

Batı Anadolu Group Companies employees carry out all activities and transactions at home and abroad within the framework of local laws and international law, and provide accurate, complete and understandable information to legal regulatory institutions and organizations in a timely manner.

While carrying out all activities and transactions, it remains at equal distance to all kinds of public institutions and organizations, administrative formations, non-governmental organizations and political parties, without any expectation of benefit, and fulfills its obligations with this awareness of responsibility.

4.2. Responsibilities Toward Customers

Batı Anadolu Group Companies employees work with a proactive approach that focuses on customer satisfaction and responds to customers' needs and demands in the shortest time and in the most accurate way.

Provides its services on time and under the promised conditions; It approaches its customers within the framework of the rules of respect, justice, equality and courtesy, and carefully protects its customers' confidential information.

4.3. Responsibilities Towards Employees

Batı Anadolu Group Companies respect the personal rights of its employees and strive to ensure the full and correct use of their individual rights. Treats employees honestly and fairly; It promises

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

them a non-discriminatory, safe, harassment-free and healthy working environment. It makes the necessary effort for the individual development of its employees. It also supports them in volunteering for appropriate social and community activities in which they will take part with an awareness of social and environmental responsibility . Batı Anadolu Group Companies observe the balance between business life and private life.

4.3.1. Human rights

Batı Anadolu Group Companies, as a party to the United Nations Global Compact, is committed to strengthening internationally protected human rights. Batı Anadolu Group Companies base their operations on complying with all applicable international declarations, principles, agreements and conventions.

Considering the impact of an integrated human rights policy in all business activities, Batı Anadolu Group Companies determine their human rights priorities as follows:

- Batı Anadolu Group Companies are against all forms of forced, bonded, dependent or compulsory labour.
- Employing child labor is strictly prohibited.
- Human trafficking is never tolerated.
- Batı Anadolu Group Companies are committed to a working environment free of discrimination and harassment for everyone and ensure that Batı Anadolu Group Companies employees fully and properly benefit from their labor rights.
- Batı Anadolu Group Companies employees have the right to establish a union, become a member of a union and make a collective bargaining agreement to the extent permitted by the relevant legislation.
- Batı Anadolu Group Companies care about employee satisfaction and increase their personal and professional development by providing them with a healthy and safe working environment.
- Batı Anadolu Group Companies treat all their employees fairly. Acts in accordance with international labor standards. All employees have the right to fair wages, reasonable hours of work and rest.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

4.3.2. Creating and maintaining a fair and safe working environment:

- Batı Anadolu Group Companies' practices comply with all applicable laws and regulations regarding employment and working life. Company employees also fulfill all legal requirements within the scope of their activities and act in accordance with legal regulations.
- Batı Anadolu Group Companies Human Resources practices; recruitment, promotion-appointment, rotation, performance management, remuneration, rewarding, social rights, training, etc. It ensures that all other applications are fair.
- Discrimination among employees within the institution due to language, race, color, gender, political opinion, belief, religion, sect, age, physical disability and similar reasons is unacceptable.
- In Batı Anadolu Group Companies, a positive and harmonious working environment that supports cooperation is created and conflict environments are prevented, thus ensuring that people with different beliefs, thoughts and opinions work in harmony. Religious propaganda cannot be made in the workplace environment.
- It is ensured that the physical working environment and conditions of the workplace are healthy and safe for all employees.
- Managers are prohibited from entering into debt-credit relationships with employees.

4.3.3. Respect and privacy in the workplace:

- Employees of Batı Anadolu Group Companies act openly, respectfully, honestly, with a sense of responsibility and within the framework of courtesy when sharing their thoughts and opinions in their relations with each other.
- All kinds of verbal, written and electronic communications between individuals cannot be recorded, shared with others, published or used for purposes other than their intended purpose without their prior permission.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

- Personnel personal information that may arise from the nature of the business relationship in workplaces and that may be necessary for its continuation is not used for purposes other than its intended purposes and is not shared with third parties without the consent of the individuals.

4.3.4. Harassment and psychological harassment (mobbing):

- Batı Anadolu Group Companies do not tolerate any violation of immunity through physical, sexual and/or emotional harassment towards its employees or stakeholders with whom they have a business relationship, in the workplace or anywhere they are for business purposes. Possible negative attitudes and behaviors towards those who report such violations or assist during the investigation are considered as a violation of these Rules of Business Ethics and Working Principles .
- Systematic and planned behaviors that aim to alienate the targeted person from work, reduce his performance, or cause him to resign, which can be considered within the scope of psychological mobbing, are not tolerated.

4.3.5. Equal Opportunity / Providing Equal Opportunities in Employment / Discrimination

Batı Anadolu Group Companies aim to create a working environment that values the talents and experiences of each individual, respects differences and gives each employee the right to express their ideas and opinions.

Batı Anadolu Group Companies do not allow discrimination among their employees. It ensures that all personnel practices are carried out based on individual ability and merit, regardless of race, religion, color, age, gender, national origin or ancestry, sexual preference, physical disability, seniority status or other factors determined and protected by law. These practices include, but are not limited to, recruitment, selection, performance management, training, placement, transfer, promotion, disciplinary action and termination of employment.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

4.3.6. Occupational Health and Safety (“OHS”)

Bati Anadolu Group Companies ensure that the physical working environment and conditions of the workplace are healthy and safe for all employees. Bati Anadolu Group Companies are obliged to provide maximum OHS conditions to all their employees, provide training and deliver their equipment. Likewise, employees are obliged to fully participate in relevant training and take all precautions regarding the issue.

All employees must notify their managers in writing/verbally of possible dangers they see in their workplace by filling out the necessary forms. Employees are obliged to comply with the details specified in the Bati Anadolu Group Companies Occupational Health and Safety Management Systems and relevant legal legislation. OHS incidents are reported to the relevant authorities transparently and in accordance with the legislation and Bati Anadolu Group Companies Policies/principles.

4.3.7. Carrying/Possessing Weapons

Employees, customers and visitors are prohibited from carrying weapons in work areas, except for those who have to carry weapons due to their duties (Security Guards, etc.). Carrying weapons for special reasons and armed entry of visitors is only possible with the permission of Human Resources

4.3.8. Substance Use

The use of any substance (alcohol, drugs, etc.) that will affect work performance or endanger workplace safety is strictly prohibited at Bati Anadolu Group Companies locations. This prohibition also includes being under the influence of these substances that will negatively affect the employee's job performance when entering the Bati Anadolu Group Companies locations.

4.4. Responsibilities Towards Suppliers / Business Partners:

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

Bati Anadolu Group Companies treats its business and solution partners and other third parties with whom it has relationships within the scope of its activities fairly and respectfully, as expected from a good customer, and takes the necessary care to fulfill its obligations on time. It carefully protects the confidential information of its business and solution partners and other third parties with whom it has business relationships. Bati Anadolu Group Companies allow the competitive independence of their suppliers/business partners. Bati Anadolu Group Companies believe in cooperating responsibly with their suppliers/business partners. In this context, Bati Anadolu Group Companies expect their suppliers/business partners to act in accordance with local laws and regulations and to undertake to disseminate and implement ethical values in their own companies and business environments.

4.5. Responsibilities Towards Competitors:

Bati Anadolu Group regulates and implements its activities in accordance with Competition Law. This rule is binding for all employees.

Bati Anadolu Group Companies promote fair and independent competition. It supports efforts to ensure the competitive structure targeted as a society.

4.6. Responsibilities Towards Environment, Society and Humanity

Bati Anadolu Group Companies are sensitive to the traditions and cultures of Turkey and the countries where they carry out international projects. It acts in accordance with the Labor Law No. 4857 and the International Labor Organization (ILO) agreements to which the Republic of Turkey is a party, regarding the prevention of child labor, and ensures that the contractors, business and solution partners and suppliers with whom it has business relations are in compliance within the scope of the said legislation.

Bati Anadolu Group Companies constantly improve their practices in the light of new understandings in the fields of technology, security, health and environmental sciences. It works regularly to ensure the continuous and measurable applicability of these developments in all Bati Anadolu Group

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

Companies. Batı Anadolu Group Companies develop successful strategies that will enable them to achieve maximum profit with third parties, without harming the needs of future generations.

Batı Anadolu Group Companies act sensitively, as a pioneer, in their responsibilities towards society and humanity, and take all precautions required by the legislation, in order to ensure that their main activities do not have negative effects on the environment. It improves employees' awareness and sensitivity on this issue. Batı Anadolu Group Companies are committed to working gradually to ensure sustainable growth, increase the use of renewable energy, prioritize clean technology, prevent environmental pollution through waste management, reduce energy consumption and emissions, and use fertile water more efficiently.

Batı Anadolu Group Companies employees act sensitively, as pioneers in social issues, with the awareness of being a good citizen; It tries to take part in non-governmental organizations and services that benefit the public.

4.7. Responsibilities towards the “Batı Anadolu Group” Identity

Business and solution partners, customers and suppliers who have business relations with Batı Anadolu Group Companies trust Batı Anadolu Group Companies as a result of professional competence and honesty. Batı Anadolu Group Companies employees try to keep this reputation at the highest level.

Batı Anadolu Group Companies offer their services within the framework of company policies, professional standards, commitments and ethical rules and show the necessary dedication to fulfill their obligations.

Batı Anadolu Group Companies take care to provide services in areas where it is believed that they are and will be professionally competent, and aim to work with customers, business partners and suppliers who comply with the criteria of accuracy and legitimacy. It does not work with people and institutions that harm social morals, harm the environment and public health, and do not respect human rights.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

When employees of Batı Anadolu Group Companies speak in front of the public and in public areas on behalf of Batı Anadolu Group Companies, they express only the opinions of Batı Anadolu Group Companies, not their own views. Batı Anadolu Group Companies employees are careful when expressing their personal opinions regarding their job responsibilities in the media or other social media platforms, with the awareness that their opinions expressed verbally or in writing may be perceived as the opinion of Batı Anadolu Group Companies.

When Batı Anadolu Group Companies employees encounter complex situations that may put Batı Anadolu Group Companies at risk, they consult experts on the subject in question by following appropriate technical, operational and administrative procedures.

Information assets provided by Batı Anadolu Group Companies must be used by Batı Anadolu Group Companies employees for business purposes. The scope of these information assets includes, but is not limited to: hardware (desktop/laptop, terminal, portable data storage media, printer/fax/copier devices, etc.), software (all software installed on clients and servers), services (e-mail, internet access, network resources) containing all kinds of data servers are included. Batı Anadolu Group Companies reserve the right to impose backup, reporting, review and usage restrictions, when necessary, regarding the corporate information assets held by employees on these platforms.

Batı Anadolu Group Companies employees take into consideration the interests of the institution in the use of resources on behalf of Batı Anadolu Group Companies, and are sensitive in protecting the assets of Batı Anadolu Group Companies. It avoids loss, damage, misuse and waste of assets of Batı Anadolu Group Companies. It is forbidden to carry out any transactions under any name, on behalf of anyone or for anyone's benefit, and to use the resources of Batı Anadolu Group Companies without the benefit of Batı Anadolu Group Companies. In cases of public interest or obligation, the approval of the top manager of the relevant business unit is required.

5. RESPECT AT WORKPLACE AND BUSINESS LIFE

5.1. Acting Respectfully and Considerately in Relationships with Others

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

The main purpose of Batı Anadolu Group Companies is to approach employees with respect, consideration and understanding and to create an environment that will contribute to full and open communication at all levels. Batı Anadolu Group Companies encourage open discussion of business problems and finding solutions to these problems.

To develop team spirit within Batı Anadolu Group Companies; Protecting and improving the corporate company identity should be adopted as a common goal. All employees and managers are responsible for creating and maintaining an atmosphere in the workplace that is compatible with all the values stated in this document.

Batı Anadolu Group Companies, race, religion, nation, gender, sexual preference, marital status, age, seniority, family, etc. It provides employment opportunities to people who are diverse in different aspects. Employees are required to value this diversity and conduct their relationships with each other in line with the principles of mutual respect, justice, courtesy, honesty and equality.

Employees should not disturb each other in common areas (including the use of service vehicles). In these areas, posters, handwritten notes and notes should not be hung, except for those permitted by the relevant management, and goods and services should not be sold.

An employee may be contacted by another employee, either directly or by phone, e-mail, etc. Harassment through indirect means such as this is unacceptable. Harassment includes, but is not limited to, the behaviors listed below.

- Describing members of a particular group in derogatory terms,
- Negative classifications, derogatory jokes, offensive remarks,
- Pictures or caricatures that are derogatory or mocking of a particular group or person,
- Any derogatory remarks or physical attacks that affect the relationship between employees by creating an uneasy and hostile work environment,
- Physical or verbal behaviors other than the distance relationship required by the work environment,
- Employee's sexual preference and promotion regarding their positions within the business , performance evaluation, cooperation with colleagues, etc. Discourses and behaviors aimed at establishing or threatening ties between
- Any unwanted sexual advances, sexual overtures or other remarks or similar gestures.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

No accusatory and/or vindictive behavior can be taken against employees who report harassment or inappropriate behavior in the work environment to the relevant management and/or the Ethics Committee. Additionally, administrators are required to manage such situations confidentially. In case of exposure to the above-mentioned type of harassment or aggressive, accusatory attitudes and behavior, if there is a problem within the institution that causes a decrease in workforce and performance, or if it is thought that any employee or colleague, manager or customer has been exposed to similar behavior, Ethical Ethics The Rules Advisor must be notified.

5.2. Attitude/Behavior and Appearance

The employees of Bati Anadolu Group Companies should be clean, attentive and in a dressing style appropriate to professional working life in the working environment; Must be friendly, caring and respectful towards everyone. This principle is extremely important in terms of developing customer relations, preserving the current reputation and increasing the prestige of the Bati Anadolu Group Companies and must be fulfilled meticulously.

Creating team spirit within Bati Anadolu Group Companies and protecting and improving the image of Bati Anadolu Group Companies is the common goal that plays an important role in the workplace and in the private life of each employee. A balanced and harmonious attitude must be displayed professionally and financially in order to prevent negative reflections on the work done and/or the image of Bati Anadolu Group Companies.

must show equal respect to customers, potential customers, shareholders and the communities to which Bati Anadolu Group Companies serve , in their non-business relationships . At the same time, employees provide courteous service in these relationships and act in accordance with ethical business conduct and relevant laws and regulations.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

5.3. Ensuring Intra-Company Hierarchy

The development of employees has a great contribution to the Batı Anadolu Group Companies' achievement of their goals. Batı Anadolu Group Companies base their employees on professional criteria and provide equal development and reward opportunities to all employees in connection with their contributions to the company's success. Managers who coordinate specific jobs or departments must exercise the powers designed for their job with balance, impartiality and taking into account the personal dignity of staff.

Managers must refrain from exploiting their positions and responsibilities for any purpose and from doing and/or having others do anything beyond their authority. Managers should continually support employees' professional development. Within the framework of honest and prudent management principles, managers are responsible for proposing and implementing management styles that will increase the company's values, provide maximum profit to the company and protect the rights of employees in the long term.

Employees should work to ensure maximum cooperation with their managers, avoiding behavior that is incompatible with working principles. As a general principle, employees are responsible for carrying out the instructions of their superiors. However, it is not obliged to carry out instructions that may harm the profitability, efficiency and reputation of Batı Anadolu Group Companies or that are not in accordance with the company's principles and legislation provisions on the subject. An employee who believes that the instructions are contrary to legal and/or internal regulations or harmful to the company reports this opinion to the senior manager who gave the instructions and to the Code of Ethics Advisor . The employee who carries out the instruction does not comply with the instruction in cases where the action taken pursuant to the instruction constitutes a violation or crime clearly stated in the relevant legislation. At the same time, if he believes that it will cause losses to Batı Anadolu Group Companies, he immediately reports the situation to the Code of Ethics Advisor . Relationships between different job levels should be regulated within the company created by the hierarchy and within the rules of mutual loyalty and respect, respecting the company values and goals.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

5.4. Attendance Obligation

Bati Anadolu Group Companies employees are obliged to take care to comply with the working hours determined for the workplace they work in and to use the personnel attendance control system (card reading, etc.) at entrance and exit.

It is essential that the employee is at the relevant workplace during working hours. An employee who leaves his/her place of duty for any reason must inform his/her immediate manager or, if his/her manager is not available, his/her closest colleague, about the place of travel and the approximate time he/she will spend away from the workplace. An employee who must be outside the organization due to his/her duty must inform his/her manager about the destination and the hours he/she will spend outside.

5.5. Sharing Information with Colleagues - Transfer/Delivery Obligation

An employee who leaves his job permanently or temporarily cannot leave his job unless he hands over the money and monetary values, documents, tools and equipment that he has to keep and use. This principle also applies to those who are temporarily assigned to another position. If the company suffers any damage due to the failure to fulfill the duty of transfer and delivery, those who caused this damage will be held responsible for the damage.

6. APPLICATION

6.1. Ways and Methods to Follow When Making Ethical Decisions

The following points should be taken into account as a guide when deciding on a course of action:

- Your planned activity/behavior; It should be evaluated whether it complies with the law, rules and traditions, whether it complies with professional standards, whether it complies with the law and other legislation, whether it is balanced and fair, and whether the relevant behavior is correct in case a third party/ company performs a similar action.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

- It should be evaluated whether discomfort would occur if all the details of the relevant activity/behavior were made public,
- a third party/ company will be in a difficult situation if it is revealed, whether it will cause negative consequences for the Batı Anadolu Group Companies and who may be affected by the behavior in the said area (Batı Anadolu Group Companies employees, business and solution partners, contractors, etc.) and
- The way an action or statement is reflected in the media should be evaluated.

6.2. Duties and Responsibilities

6.2.1. Duties and Responsibilities of Employees

Batı Anadolu Group Companies Business Ethics Rules and Working Principles have determined in detail the ethical rules on how to behave and how work should be done on a daily basis. Compliance with these rules is the primary responsibility of all employees.

In this regard, all Batı Anadolu Group Companies employees;

- Acting in accordance with the law and regulations under all circumstances,
- Participating in training regarding the Batı Anadolu Group Companies Code of Ethics and Working Principles, reading and understanding the relevant documents and acting in accordance with them,
- Learning and applying general and business-specific policies and procedures applicable to the company,
- Acting in full compliance with the rules and instructions set within the scope of Occupational Health and Safety and taking the necessary precautions while doing work,
- Consultation with his manager and/or Code of Ethics Advisor regarding potential violations of this Code of Business Ethics and Working Principles regarding himself or others ,
- Immediately report possible violations of self or others; To convey their notifications on these issues, either named or anonymously, to their manager and/or Ethics Rules Advisor, in writing or verbally,

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

- Following the "Ways and Methods to be Followed in Ethical Decision Making", which are defined to help act in accordance with the rules and solve problems ,
- cooperating with the Ethics Rules Advisor and/or the Ethics Committee in ethical investigations and keeping information regarding the investigation confidential.

6.2.2. Duties and Responsibilities of the Code of Ethics Consultant

Ethics Rules Consultant is the top manager of the Human Resources business unit within Batı Anadolu Group Companies.

Code of Ethics Advisor;

- To inform employees about the Code of Business Ethics and Working Principles, to provide periodic ethical training and to constantly communicate with the employees of Batı Anadolu Group Companies on this subject,
- Ensuring that new hires read the Code of Business Ethics and Working Principles document, informing them about this issue and ensuring that they sign the Employee Commitment (Annex-2),
- Ensuring that employees update their Business Ethics Compliance commitments every year,
- To provide guidance and consultancy on questions and issues submitted by employees regarding ethics within the Batı Anadolu Group Companies,
- Referring unethical statements and actions within Batı Anadolu Group Companies that cannot be resolved or require investigation to the Ethics Committee,
- To contribute to the resolution of unethical statements and actions within the company that it receives, in line with the request of the Ethics Committee,
- To report ethics-related questions and unethical statements and actions to the Ethics Committee on a regular basis and when requested by the Ethics Committee,
- To be the contact person within the company in the investigations carried out by the Ethics Committee and to provide the necessary support to the investigations,
- Responsible for monitoring and monitoring the effectiveness of ethical practices carried out in the company and supporting the practices.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

6.2.3. Duties and Responsibilities of Managers

In addition to the responsibilities defined for employees within the framework of the Business Ethics Rules and Working Principles, managers of Batı Anadolu Group Companies; They also have the following responsibilities. Accordingly, managers;

- To ensure the creation and maintenance of a company culture and working environment that supports ethical rules,
- To set an example with their behavior in the implementation of ethical rules and to train their employees on ethical rules,
- To support its employees in communicating their questions, complaints and notifications regarding ethical rules,
- To provide guidance on what needs to be done when consulted, to take into account all notifications made and to forward them to Human Resources as soon as possible when deemed necessary,
- He is responsible for ensuring that the business processes under his responsibility are structured in a way that minimizes risks related to ethical issues and for applying the necessary methods and approaches to ensure compliance with ethical rules.

6.2.4. Other Responsibilities

- Batı Anadolu Group Companies senior management; They are responsible for the effective implementation of these Rules of Business Ethics and Working Principles and for creating a culture that supports them.
- Business Ethics Rules and Working Principles and all related policies are reviewed, revised and documented by Human Resources with the recommendations of the Ethics Committee and announced to Batı Anadolu Group Companies with the approval of the Executive Board.

The management of Batı Anadolu Group Companies carries the following responsibilities in cooperation with the Code of Ethics Consultants and/or the Ethics Committee:

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

- To ensure the confidentiality of complaints and notifications made within the framework of the Code of Ethics and to protect individuals after their notifications,
- To ensure job security of employees who notify,
- To ensure that complaints and notifications are investigated in a timely, fair, consistent and sensitive manner and to take necessary actions decisively as a result of violations.

6.3. Notification and Resolution of Non-Compliance with the Code of Ethics

6.3.1. Ethics Committee Organization

Inconsistencies in ethical issues are resolved within the Batı Anadolu Group Companies Ethics Committee.

The Ethics Committee, which works under the Executive Board, determines that the ethical rules have been violated within the scope of the Batı Anadolu Group Companies Business Ethics Rules and Working Principles and other policies and procedures within the scope of the Ethics Board's control, which are regulated on matters related to the business and operation of the Batı Anadolu Group companies. It was established to evaluate the notifications submitted to it and to make recommendations to the managements of Batı Anadolu Group Companies regarding the ways, methods and practices to be followed in case of violations of ethical rules.

Ethics Committee, three It consists of members. The Executive Board elects the members of the Ethics Committee. Board members elect a chairman from among themselves (“ **Ethics elects the Chairman of the Board** ”). Ethics Committee; Although it may be changed by the Executive Board, it principally consists of the Legal Manager, Internal Audit Manager and Human Resources Manager. The Human Resources Manager serves as the rapporteur of the Ethics Committee. Ethics Committee Members serve for a period of three years. It is possible for a member of the Ethics Committee, once elected, to be re-elected. The Executive Board may appoint a new member to the Ethics Committee if it deems it necessary or if any member of the Ethics Committee leaves office/ends of duty. The Ethics Committee meets at least once a year when it receives an application regarding the violation of ethical rules, when an ex officio review is deemed necessary, when it is

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

assigned by the Senior Management to conduct an investigation on a specific issue, and in any case. The Ethics Committee submits an annual report to the Executive Board regarding its activities in each calendar year.

By the Chairman of the Ethics Committee; Information is regularly shared with the Executive Board regarding the convening of the Ethics Committee, task distribution, reporting and follow-up of the Ethics Committee's decisions.

6.3.2. Responsibility of the Ethics Committee

The Ethics Committee is responsible for the transparent implementation of the ethical principles of Batı Anadolu Group Companies. The Ethics Committee may request the support of other units designated by the Executive Board in the process of coordinating the activities of implementing ethical principles.

6.3.3. Application to the Ethics Committee

The Executive Board may request an investigation from the Ethics Committee on any subject or person it deems necessary and a report prepared within the scope of this investigation.

Employees, suppliers, contractors and business and solution partners who wish to apply to the Ethics Committee can submit their requests via e-mail to “etik@batianadolu.com” or by petitioning the Ethics Committee to the address specified in the section titled “**6.3.6**” of this document. . Senior Management; They may forward their requests within this scope to the Ethics Committee in any way they deem appropriate.

6.3.4. Evaluation of Applications

, the Ethics Committee evaluates whether the relevant complaint is subject to review. If it is decided to examine the complaint, the Ethics Committee first aims to reach a consensus by interviewing the relevant people. Reconciliation occurs when the person in the conciliation process provides sufficient

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

evidence or sufficient explanation to convince the Ethics Committee that the action subject to the complaint did not occur. It is mandatory for at least two Ethics Committee members to attend the conciliation meeting, one of whom is the Ethics Committee Chairman. Consensus is achieved by the vote of the Chairman of the Ethics Committee and at least one member attending the meeting. The Ethics Committee records each reconciliation meeting with a report.

If agreement cannot be reached, the issue is examined in every aspect by the Ethics Committee and, if any, by persons authorized by the Ethics Committee, and a report is prepared on the subject in line with the findings and opinions obtained. All Batı Anadolu Group Companies employees are obliged to provide the necessary information and documents to the Ethics Committee within the scope of the review activities carried out by the Ethics Committee. The Ethics Committee receives the defense of the relevant person before preparing the report subject to review or, in any case, before this report is submitted to the Executive Board. In cases where this is not possible, a decision may be made based on written statements and statements provided through other means of communication. At least two Ethics Committee members take part in these meetings.

The report created at the end of the review is presented to the Executive Board by the Chairman of the Ethics Committee. After reviewing the report, the Executive Board decides whether any sanctions are required for the action subject to the complaint and assigns the relevant units to implement it. If necessary, the situation is discussed together with the Board of Directors of the relevant Batı Anadolu Group Company and ensures that a decision is made.

6.3.5 Working Principles of the Ethics Committee

Ethics Committee; The senior management of Batı Anadolu Group Companies, including the Executive Board, members of the Ethics Committee and the Chairman of the Ethics Committee, may conduct investigations against employees, suppliers, contractors, business and solution partners. At the same time, the Executive Board may assign the Ethics Committee to conduct special research and investigation.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

In case an investigation is carried out regarding an action or statement contrary to ethical rules by one of the members of the Ethics Committee or the Chairman of the Ethics Committee, the Ethics Committee meets without the participation of the relevant member.

From the senior management of Batı Anadolu Group Companies In case an investigation is carried out regarding someone's action and statement contrary to ethical rules, the final decision on the matter is made by the Board of Directors of the relevant Batı Anadolu Group Company, without the participation of the relevant person.

Ethics Committee discussions and reviews are conducted confidentially. The Ethics Committee may share any information regarding the process it carries out with the Executive Board. Persons authorized by the Ethics Committee are under the same obligation of confidentiality and confidentiality as the Ethics Committee.

The Ethics Committee carries out its work within the framework of the principles set out below:

- Keeps notifications and complaints and the identities of those who make notifications or complaints confidential.
- It adopts a policy to prevent possible retaliatory attitudes and behaviors towards employees or individuals who report ethical violations.
- Conducts investigations and investigations within confidentiality rules.
- It has the authority to request information, documents and evidence related to the examination and investigation directly from the existing unit. It can examine all kinds of information and documents it obtains only limited to the subject of the investigation.
- The review and investigation process is recorded in written minutes from the very beginning. Information, evidence and documents are added to the report.
- The minutes are signed by the Chairman of the Ethics Committee and the members.
- Notifications subject to review and investigation are handled promptly and results are reached as quickly as possible.
- The decisions taken by the Board are put into practice immediately.
- The relevant departments and authorities are informed about the result.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

- The Chairman and members of the Ethics Committee act independently and without being influenced by the department managers they report to and the hierarchy within the organization while performing their duties on this issue. They cannot be pressured or suggested on the subject.
- If deemed necessary, the Ethics Committee may seek expert opinion and may benefit from experts by taking precautions that will not violate confidentiality principles during the review or investigation.

6.3.6. Collection of Evidence

Evidence must be collected to conduct an in-depth investigation of the violation of the Code of Ethics and to make final decisions about the incident. The following issues should be taken into consideration when collecting evidence by the Ethics Committee;

- Ensuring the integrity and security of printed and electronic records, data and computer copies related to the incident,
- Protecting the integrity and security of all records received, including original versions and copies of documents,
- Recording only the facts, not including subjective comments and opinions.

Batı Anadolu Group Companies Business Ethics Rules and Working Principles have been published with the approval of the Chairman of the Board of Directors and are reviewed once a year in line with needs, changing conditions and current practices.

You can use the following communication channels for your questions and notifications.

Email:	etik@batianadolu.com
Address	Ankara Street No: 335- Bornova/İZMİR / Attention Ethics Committee
	Batı Anadolu Çimento Sanayi A.Ş.

BATI ANADOLU GROUP BUSINESS ETHICS RULES AND WORKING PRINCIPLES

Related documents

1. Gift Acceptance Declaration Form
2. Employee Commitment

GÜLANT CANDAŞ

Deputy Chairman of the Board of Directors

Executive Director