



#### OUR MISSION:

To be a reliable, efficient and leading company that makes a difference in the automotive industry by ensuring the satisfaction of our customers, employees, society and other stakeholders.

#### OUR VISION:

To be the company preferred by the main industries in the ever-developing automotive industry in product groups that are safer, lighter, autonomous and work with new energy sources.

#### OUR VALUES:

Customer Focus Being Reliable Being Respectful To People Being Respectful To The Environment Continuous Improvement Being Dynamic Working With Team Spirit Collaboration Oriented Innovation Commitment To Ethical Values

#### OUR QUALITY POLICY:

As Beyçelik Gestamp, we want to be the most well-known automotive supplier with our customer focus and product quality throughout their lifecycle, while protecting our sustainable, economic, environmental and social areas. We make every effort to research and develop innovatively designed products and trend-setting technologies to stay at the forefront of technological innovation in the automotive industry. We aim to enable the production of increasingly safer and lighter vehicles to reduce energy consumption and environmental impact. In addition to our zero-defect strategy, we strive to be the benchmark in quality for our customers by focusing on preventive quality based on risk management and constantly improving our products, processes and quality management system. As an exemplary legal entity, we take responsibility for our products, our employees, our environment and everyone affected by our actions that respond to applicable requirements. The following values represent our company strategy and our commitment to society: - Customer-centered business execution, -Internalized operational excellence, -Innovation through progress, -Sustainability to ensure stability over time, -People are the architect of success,

#### OUR ENVIRONMENT, ENERGY AND WATER POLICY:

-To fulfill all our legal and other obligations regarding the Environment and Energy, -To manage the waste generated as a result of our activities in accordance with the zero waste and waste management hierarchy, - To observe national and international emission targets within the scope of combating climate change and to provide added value to the low carbon economy. , -To use energy at optimum level and focus on the use of renewable energy, -To work to reduce natural resource consumption and to monitor and control our greenhouse gas emissions, -To cooperate with our internal and external stakeholders in order to increase their environmental awareness, to develop together with developing stakeholder relations. To leave a clean environment to our society and future generations by serving our goals, -To determine measurable targets to reduce our environmental impacts and energy consumption, and to continuously improve our environmental and energy management systems by periodically evaluating our performance according to these targets, - To monitor and report water consumption, -To reduce water consumption We aim to develop projects for water pollution and take the necessary measures to prevent water pollution, -to continue our work in full compliance with the legislation we are subject to regarding water, -to manage energy consumption with a systematic approach and to reduce our carbon footprint. In this regard, we are committed to the implementation and continuity of the energy management system that aims to improve energy performance and continuous improvement.

#### OUR OCCUPATIONAL HEALTH AND SAFETY POLICY:

We aim to prevent injuries and health deterioration as a result of work accidents and occupational diseases in human resources. To continuously improve our performance while meeting all our national legal and other obligations in this field; - Ensuring that our workplaces are healthy and safe, - Preventing hazards before their consequences occur and adopting a risk-based process approach to reduce all occupational health and safety risks that may occur, continuously improving our integrated management system, - Training our employees, contractors, subcontractors, visitors and intern students. , to create a common occupational health and safety culture with their participation, - As a development opportunity; To use the early equipment management process and modernize our facilities with new technologies through training, planning, inspection, annual targets and review activities, - To adopt proactive activities as the direct and joint responsibility of our senior management and employees, - To participate in occupational health and safety studies at all levels of our human resources. - To evaluate risks and opportunities together with applicable conditions, to improve the results by consulting our human resources, - To effectively use training, recognition/appreciation, target setting, monitoring and review processes to ensure the implementation of our policy, - To achieve our goals, occupational health and safety We are committed to providing timely support to activities on the subject.OUR HUMAN RESOURCES POLICY: Our goal is to create and implement value-creating human resources strategies to achieve the company vision and business results. We work to be a company where everyone wants to work and is proud to work by constantly reviewing our processes that are people-oriented, respectful to employees, developing the personal and professional knowledge, skills and competencies of our employees, and targeting employee satisfaction.OUR LABORATORY POLICY:

In the measurement, control, testing, verification and calibration processes carried out in our laboratories, we provide consistently reliable results that are compatible with national and international standards, in line with customer requests, within the framework of professional and technical practice principles, by using traceable devices. In order to provide reliable results, we effectively implement the quality management system principles and comply with new updated regulations and standards. We provide service with expert and reliable personnel who know and apply the requirements of laboratory standards and use documentation correctly.

#### OUR INFORMATION SECURITY MANAGEMENT SYSTEM POLICY:

To ensure the security of information regarding all existing and future activities within the scope of the Authorized Economic Operator Status, to ensure business continuity with minimal interruption, to ensure the confidentiality of all information belonging to the Company and the third parties it is obliged to protect, to protect all kinds of physical and electronic information assets used in the maintenance of business processes and services. It aims to protect it in line with Confidentiality, Integrity and Accessibility criteria.

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#### OUR GENDER EQUALITY POLICY:

Purpose of the Policy: By adopting a sustainable gender equality approach in the corporate working culture and operating processes, it is primarily to raise awareness in the business and social lives of its employees, to raise awareness in future generations, and to be a role model in its sector with the slogan "I am in it for equality". 1. Respects human rights. It carries out the necessary work to create working areas under equal conditions. 2. Implements the equality action plan, produces projects, collaborates and raises public awareness. It measures, monitors and evaluates towards its goals. 3. It is based on and implements the Women's Empowerment Principles (WEPs), of which it is a corporate signatory, and supports equal opportunity and equal participation in the workforce, regardless of gender. 4. It ensures that there is no discrimination in recruitment, employment processes, promotions and dismissals (religion, language, race, gender) and that selection is made based on the requirements of the job and the person's competencies and abilities. 5. It is against violence in all areas of life. It carries out studies to raise awareness of its employees about gender-based violence in work, social life and family. 6. It protects the privacy and confidentiality of the person subjected to domestic violence, provides information about application centers, and directs them to a non-governmental organization specialized in the relevant field. 7. It carries out education and awareness activities to raise awareness of gender equality in future generations and especially to empower girls in life. 8. Care is taken to ensure that discriminatory and sexist content is not used in the internal and external communication language of the institution. 9. It encourages its suppliers and cooperating organizations to carry out studies in the field of gender equality.

#### OUR SUSTAINABILITY POLICY:

Contributing to sustainable development and constantly increasing the value we create for all our stakeholders forms the basis of our sustainability approach. With this approach, we ensure the management of our main sustainability focuses and related issues, which we have determined in line with a systematic approach accepted by international standards, with our "Sustainability Policy". In parallel with this management approach, we make every effort to carry out our operations in accordance with the United Nations Sustainable Development Goals. In this context, with our Beyçelik Group of Companies Sustainability Policy; To develop sustainable products and services with quality and safety qualities that will meet our customers' expectations and keep their satisfaction at the highest level. To manage our operations and stakeholder relations with a corporate governance approach based on transparency and accountability, constantly observing business ethics. To constantly evaluate the risks related to our priorities with a proactive approach and take the necessary measures. To implement practices that will disseminate the business ethics, quality and sustainability approach we have in our entire value chain, especially our supply chain. To develop our stakeholders in our value chain. To maintain our performance by managing our R&D, innovation and digitalization processes with the philosophy of continuous development and improvement; To contribute to the development of resources by disseminating artificial intelligence applications in our business processes. To uninterruptedly implement efficiency and improvement studies that will reduce/minimize our environmental impact within the scope of combating climate change. To uninterruptedly implement operational excellence projects that will ensure efficient use of resources. To improve our performance regarding Occupational Health and Safety. To work in light of national/international standards. To constantly diversify our modern human resources practices in order to be an employer that will be preferred by employees. To provide opportunities for our employees to continuously improve themselves while providing equal conditions. To be against all kinds of discrimination, forced and compulsory labor and child labor, under the guidance of universal human rights. We are committed to implementing social responsibility projects that will improve our society and contribute to its welfare.

#### OUR HUMAN RIGHTS POLICY:

**Respect for People, Equal Opportunity** We support and respect internationally valid human rights principles. We do not tolerate verbal or actual harassment in the workplace. We do not discriminate among our employees on the basis of age, race, gender, belief, language, religion, nationality, marital status, sexual preference, seniority, political opinion, military status, or disability. In all conditions such as recruitment, placement, promotion, termination of employment, recall, transfer, leave, wage and training, age, race, gender, belief, language, religion, nationality, marital status, sexual preference, seniority, political opinion, military service. We do not discriminate on the basis of condition or disability. We evaluate the competencies and performances of our employees through systems created by Human Resources based on objective criteria, and as a result of this evaluation, we provide opportunities for career and development for each employee, creating equal opportunities for everyone. **Working Hours and Wages** We implement our working hours in accordance with the procedures and principles specified in the labor law. Our wage policy; We create jobs of equal value, without discrimination, according to the sector and local labor market. **Occupational Health and Safety** We offer a safe and healthy working environment to our employees. We follow and enforce all local laws to ensure the occupational health and safety of our employees. We regularly inform our employees to ensure that the legislation on occupational health and safety is learned and implemented correctly. **Training and Development** We believe that the most important investment is the investment we make in our employees, and in this regard, we support our employees with continuous training for their personal development. **Forced Labor and Child Labor** We comply with the Regulation on the Procedures and Principles of Employment of Child and Young Workers, and do not employ employees under the age of 18 in accordance with our corporate human resources approach. We prohibit practices that violate the freedom to work and work by using force or threats or any other unlawful behavior. **Right to Form a Union and Collective Bargaining** We respect employees' freedom to establish unions and ensure that the right to collective bargaining is effectively recognized. **Environment** We manage all our activities and investments with the goal of sustainable growth. We act with a sense of responsibility towards our environment and take the necessary precautions during our activities. **Data Privacy** We take measures to protect the personal data of our employees and apply the standards specified in the laws and regulations in this regard.

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## OUR SUPPLY CHAIN COMPLIANCE POLICY:

### 3. GENERAL PRINCIPLES

BEYÇELİK GESTAMP selects its Business Partners according to criteria such as technical competencies, product and service quality, pricing, corporate reputation and financial soundness. BEYÇELİK GESTAMP also evaluates compliance risks associated with Business Partners according to a risk-based approach to ensure compliance with the principles set out in this Policy. Within the framework of this approach, the following issues are adopted: o Carrying out the pre-qualification evaluation process in accordance with BEYÇELİK GESTAMP's Company Pre-Competence Evaluation Procedure before entering into a Business Relationship ("Pre-Competence Evaluation Procedure") before entering into a business relationship with Business Partners, and ensuring the provision of corporate documentation. . conducting financial, technical and nominal competency research, o Having the right to audit to be used when necessary to determine whether the ethical rules, especially the current legislation, contractual obligations with BEYÇELİK GESTAMP and the "Guiding Principles for Business Partners" explained in detail below, are complied with, o Providing necessary training to ensure compliance, if necessary. **Admission Process** Business and operational units, as the first line of defense, before entering into or starting any business relationship with a new Business Partner; · Fulfill the requirements of the Pre-Qualification Assessment Procedure; · Prohibited List Inquiry through a third party screening tool in order to confirm whether the relevant party is subject to any Sanction Obligations, · Advanced due diligence in case the relevant party is a candidate supplier to be purchased from production and a representative acting on behalf of the company<sup>6</sup> (Information Request Form (Request Form (Information Request Form)) KYC), filling out the Self-Assessment Form), · Evaluating whether they comply with the BEYÇELİK GESTAMP Guiding Principles for Business Partners ("Principles") detailed below. If the due diligence results contain any warning signs of non-compliance and the Business Partner in question is a dealer, distributor, representative acting on behalf of the company, or a supplier candidate for production purchasing, an advanced due diligence is carried out for the relevant parties in accordance with the Pre-Qualification Assessment Procedure. . In case the result of advanced due diligence is negative (i.e. the relevant party does not act in accordance with the Principles and / or does not take the necessary measures to eliminate the violation in question), the decision to start or continue work is subject to the written approval of BEYÇELİK GESTAMP Senior Management.

### 4. GUIDING PRINCIPLES FOR BUSINESS PARTNERS

BEYÇELİK GESTAMP Guiding Principles for Business Partners have been prepared in accordance with the UN Global Compact. All Business Partners of BEYÇELİK GESTAMP are expected to comply with these Principles.

#### 4.1. Legal Regulations

BEYÇELİK GESTAMP Business Partners are expected to comply with all laws and regulations within the scope of their activities and sectors. In this context, all Business Partners such as suppliers, distributors and authorized services are expected to comply with competition laws, legislation on preventing Money Laundering and financing of terrorism, data privacy regulations and laws on anti-bribery and anti-corruption, and all other applicable legislative provisions.

#### 4.2. Fighting Bribery and Corruption and Preventing Money Laundering

Business Partners are expected to comply with the applicable legislation regarding the fight against bribery and corruption and the prevention of Money Laundering while carrying out their activities on behalf of BEYÇELİK GESTAMP. Any form of bribery or the giving or receiving of anything of value, directly or indirectly, to gain unfair advantage and influence impartial decision-making processes is unacceptable. Any activity that may lead to Money Laundering, whether malicious or not, is illegal and unacceptable. All transactions must be recorded in legal books and records that are accurate, transparent and contain adequate disclosures.

#### 4.3. Intellectual and Industrial Property Rights

BEYÇELİK GESTAMP Business Partners are expected to avoid violating any intellectual and industrial property rights of third parties, such as patents, utility models, industrial designs, copyrights, trademarks and so on, or actions that may lead to unfair competition, within the scope of their activities.

#### 4.4. Human rights

Business Partners are expected to carry out their commercial activities in accordance with BEYÇELİK GESTAMP Human Rights Policy.

**4.4.1. employment** BEYÇELİK GESTAMP's Business Partners must ensure that their activities are not associated with child labor, forced labor or labor exploitation. In addition, BEYÇELİK GESTAMP expects its suppliers, distributors and authorized services to have a "zero tolerance" approach towards slavery and human trafficking, in accordance with the ILO Conventions and Recommendations, the Universal Declaration of Human Rights and the UN Global Compact.

**4.4.2. Compliance with Labor Laws** Business Partners are expected to comply with the labor laws of the countries in which they operate. The wage determination process should be determined competitively according to the relevant sectors, the local labor market and in accordance with the terms of collective bargaining agreements, if any. All wages, including benefits, must be paid in accordance with applicable laws and regulations.

**4.4.3. Preventing Harassment and Violence** Business Partners are expected to provide a work environment free of violence, harassment, and other unsafe and disruptive conditions resulting from internal and external threats. Physical, verbal, sexual or psychological harassment, bullying, abuse or threats of any kind will not be tolerated.

**4.4.4. discrimination** Business Partners are assured that any discrimination, especially gender discrimination, is not accepted, employees are treated fairly, and discrimination is not tolerated (race, gender, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definitions or political opinions). etc.) are expected to provide a working environment.

**4.4.5. Freedom of Association and Collective Bargaining** Business Partners, It must respect the rights and freedoms of its employees to join a union and engage in collective bargaining without any fear of retaliation.

**4.5. Health and Safety** Business Partners are expected to provide a safe and healthy working environment, comply with all relevant legal regulations and take and implement all necessary safety measures for all work areas. When unsafe conditions or behavior occur, Business Partners must immediately take appropriate measures to minimize the risk of injury and accident.

**4.6. Conflict Minerals** Mineral trade in politically unstable regions should not be used to finance armed groups, promote forced labor and other human rights abuses, or support bribery and money laundering. BEYÇELİK GESTAMP expects its Business Partners to comply with the international responsible procurement Standards<sup>8</sup> introduced by the OECD in the supply of minerals called "Conflict zone minerals" such as tin, tungsten, tantalum and gold.

**4.7. Environment** BEYÇELİK GESTAMP expects its Business Partners to make maximum efforts to protect and preserve the environment. In this context, BEYÇELİK GESTAMP supports its Business Partners on the following issues: — To comply with all applicable environmental regulations, including BEYÇELİK GESTAMP's Environment and Energy Policy. — Continuously improving their environmental performance and reducing their environmental impact for climate change, water management, waste management and biodiversity protection. — Having effective monitoring systems and procedures against industrial accidents and other emergencies. — To encourage Business Partners to improve the environmental performance of their business partners and third parties.

**4.8. Ethic** BEYÇELİK GESTAMP requires its Business Partners to carry out all their business and transactions in accordance with the law, international agreements to which the Republic of Turkey is a party, the United Nations Declaration of Human Rights, the United Nations Global Compact, and to ensure fairness, accuracy, honesty, expects them to act within the framework of the principles of responsibility, trust, accountability, openness and respect.

**4.9. Conflict of Interest** Business Partners or other persons and organizations that may have a business relationship with BEYÇELİK GESTAMP should not enter into personal relationships that may lead to a conflict of interest between BEYÇELİK GESTAMP and themselves (or their relatives) or that may be perceived as such and damage the reputation of BEYÇELİK GESTAMP. There is no kinship, friendship or similar close relationship between Business Partners or other persons and organizations that may have a business relationship with BEYÇELİK GESTAMP and BEYÇELİK GESTAMP employees who employ these people and organizations, approve their work or make decisions regarding them. This situation creates a risk of conflict of interest. The person, organization and BEYÇELİK GESTAMP employees who are or may be in this situation are obliged to immediately report the situation to the relevant Human Resources and Information Technologies Directorate.

**4.10. Reporting** Business Partners are expected to establish effective communication channels to report violations and take necessary measures in a timely manner. Business Partners and employees should be able to report their concerns through these communication channels without fear of retribution or retaliation. In addition, it is possible for Business Partners' employees to convey their concerns through the notification channels detailed in the Authorities and Responsibilities section of this Policy.

**4.11. Training and Development** BEYÇELİK GESTAMP encourages its Business Partners to provide training programs and tools to their employees to gain more skills and competencies.

**4.12. Management Systems** Business Partners are expected to have effective and functioning management systems to ensure that they operate in accordance with laws, regulations and the Principles contained in this Policy.

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#### **OUR INFORMATION TECHNOLOGIES SERVICE MANAGEMENT SYSTEM POLICY:**

To use talent and resources in the most appropriate way to provide the right service to meet the needs of Beyçelik Gestamp and its subsidiaries and to provide resources that are competent to provide the service, to ensure the continuity of our management system supported by the Senior Management, compatible with the requirements of the IT Service Management System standard and our current processes, to meet the needs and expectations of its customers. To ensure that the services provided for the company comply with all relevant legal and other conditions as well as contractual regulations, to develop and provide services in line with customers' expectations and to support the continuous development of these services, to provide IT Service Delivery that meets and aims to exceed customer expectations. To meet and record the problems in the services offered by the Service Desk. To ensure that the SLAs of the services offered are compatible with the SLA periods defined for the services in the Beyçelik Gestamp Service catalogue. Monitoring all software, hardware and data communication equipment in use through the Version Management Process, including version and security patches, etc., and ensuring that they are updated according to the relevant processes, and using the correct versions in units and customers. To establish and maintain good relationships between service providers and customers based on understanding customers and their businesses through the Business Relations Management Process. Monitoring system capacities according to determined criteria and taking precautions when necessary. To control the operation of processes through internal and external audits and to take corrective and preventive actions. To provide awareness training to employees and third parties about new and changing jobs and processes,

#### **OUR CONFLICT MINERALS POLICY:**

In politically unstable regions, mineral trade can be used to finance armed groups, promote forced labor and other human rights abuses, and support bribery and money laundering. The main areas of use of minerals called "conflict minerals (3TG)" such as tin (Sn), tungsten (W), tantalum (Ta) and gold (Au); automotive industry (production of electronic components, sensors and other parts in vehicles), electronic devices (mobile phones, laptops, etc.), aviation equipment production, medical devices and equipment, industrial machinery/equipment manufacturing and jewelry production. It is difficult for customers and consumers to know whether a product they are purchasing is financing conflict, human rights violations, and crimes in other countries. Beyçelik Gestamp adopts that conflict minerals should not be supplied from high-risk areas affected by conflicts (CAHRA Conflict-affected and high-risk areas) under any circumstances and aims to ensure that its products and processes do not contain minerals obtained from organizations that directly or indirectly finance conflicts and high-risk areas affected by conflicts. Even though Beyçelik Gestamp does not purchase conflict minerals directly from any source, it is aware of the possibility of these minerals being part of the supply chain. Being aware of this, it attaches importance to procuring these minerals responsibly by integrating the "OECD Compliance Guide for Responsible Supply Chain for Minerals of Conflict-Affected and High-Risk Regions"<sup>1</sup> into its purchasing processes. In this context, Beyçelik Gestamp is responsible for its Business Partners (suppliers, distributors, dealers, authorized services and all other third parties with whom it has a business relationship, as well as all kinds of representatives, subcontractors, consultants, etc. acting on behalf of the company) in the supply of conflict minerals. To meet international responsible supply standards in accordance with the "OECD Compliance Guide for the Responsible Supply Chain for Minerals of Affected and High Risk Regions", to work to adopt similar conflict minerals policies consistent with the Beyçelik Gestamp Conflict Minerals Policy and the Beyçelik Gestamp Supply Chain Compliance Policy, to produce products in which conflict minerals can be used. To identify and review the supply sources for these products, to cooperate with their own suppliers for this purpose, if they become aware of any action that is thought to be contrary to the Beyçelik Gestamp Conflict Minerals Policy or if they detect a negative situation or risk regarding conflict minerals in the supply chain, Beyçelik Holding Ethics It is expected that they will apply to the Board (Ethics Line), cooperate with Beyçelik Gestamp to prevent the risk and, if necessary, terminate their cooperation with risky suppliers. Beyçelik Gestamp's employees and managers in the regions where it operates are obliged to act in accordance with the Beyçelik Gestamp Conflict Minerals Policy and to implement and support Beyçelik Gestamp's relevant procedures and controls in line with the requirements of this policy. All Business Partners with whom we have a relationship in the supply of goods or services are expected to comply with the principles and principles contained in the Beyçelik Gestamp Conflict Minerals Policy and the necessary steps are taken to ensure this.

#### **OUR INFORMATION SECURITY MANAGEMENT SYSTEM POLICY:**

This policy covers the legal entities within Beyçelik Gestamp (Beyçelik Gestamp Automotive, Çelikform Gestamp, Beyçelik Gestamp Şasi and Gestamp Beyçelik Romania SRL). Beyçelik is aware that the confidentiality, integrity and accessibility of all forms of information have a critical role in Gestamp's sustainable success and good management practices, and that failure to ensure information security at an adequate level will increase the risk of reputational damage as well as financial losses. This information security policy, in addition to outlining the approach to information security management, also sets forth the guiding principles and responsibilities necessary to protect the security of information systems. In order to ensure the confidentiality, integrity and accessibility of the information that the institution is obliged to protect, as required, in accordance with TS ISO / IEC 27001 Standards; All employees, suppliers, business partners and all other third parties who access and use information assets must comply with information security policies, procedures and instructions. They must report security and incident violations to the responsible unit. All parties must ensure the confidentiality of the institution's information. It must convey the suggestions and improvements it deems appropriate for the development of the system. Management; It declares that it will prove its commitment to the installation, implementation, operation, monitoring, review, maintenance and continuous improvement of the Information Security Management System (ISMS) in accordance with TS ISO / IEC 27001 Standard by performing the following points. Determining ISMS objectives and making the necessary plan to achieve these objectives. Ensuring risk management within this framework by analyzing the risks on assets and processes and presenting risk assessments and risk criteria based on the results of the analyses. Defining the importance of meeting information security objectives and complying with information security policies, responsibilities to laws and contracts, and the need for continuous improvement. Providing adequate resources to establish, implement, operate, monitor, review, maintain and continuously improve the ISMS. Organizing and managing the necessary studies to determine risk acceptance criteria and acceptable risk levels. Announcement of innovations, changes and developments within the framework of the Information Security Management System in a way that ensures the awareness of all employees and stakeholders.

#### **OUR CODE OF BUSINESS ETHICS:**

The business ethics rules that Beyçelik Gestamp employees must comply with have been determined by the Beyçelik Holding Ethics Board. Compliance with the Code of Business Ethics is the responsibility of all employees and managers to guide them in complying with these rules. Notifications of Beyçelik Holding employees or third parties to the Ethics Committee are kept confidential. The review and investigation are carried out confidentially and within the framework of the Ethics Committee Working Principles. <https://beycelikgestamp.com.tr/UserFiles/File/BEYCELİK-GESTAMP-IS-ETİGİ-KURALLARI.pdf>

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# Beyçelik Gestamp

## OUR ANTI-BRIBERY AND CORRUPTION POLICY:

1. **PURPOSE** The purpose of Beyçelik Gestamp Anti-Bribery and Corruption Policy is to set out the framework of the principles and principles regarding the fight against bribery and corruption and to ensure their communication in a transparent manner. With this policy, it aims to identify, reduce and manage bribery and corruption risks in compliance with legal regulations, business ethics principles and universal legal rules. The policy is also in integrity with the Beyçelik Gestamp Code of Business Ethics, Beyçelik Gestamp Policies and Values and is implemented throughout our own operations and our entire value chain. Our internal practices take as reference the Beyçelik Gestamp Anti-Bribery and Corruption Policy and the Beyçelik Gestamp Business Ethics Rules. **DEFINITIONS** Conflict of Interest: All kinds of material and moral interests that indicate having interests that prevent or may create the perception that they prevent employees from performing their duties impartially for which they are responsible. Ethics Board: The Ethics Board is the board that works under the Vice Chairman of the Board of Directors of Beyçelik Holding and decides on the actions to be taken in case of complaints and notifications regarding the violation of ethical rules within the scope of "Beyçelik Gestamp Business Ethics Rules". Gift: Any item or benefit accepted directly or indirectly, with or without economic value, that affects or is likely to affect the employee's impartiality, performance, decision or performance of duty. Business Partners: Suppliers, distributors, dealers, authorized services and all other third parties with whom we have a business relationship, and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of the company. It covers. Money Laundering: Integrating the revenues obtained from illegal activities into the financial system as if they were obtained legally, in other words, hiding the fact that these revenues were obtained from illegal activities. Bribery: In order to ensure that a person performs an action directly or through intermediaries that is contrary to the requirements of the duty or outside the ordinary course of business, such as doing, not doing, not doing, accelerating, slowing down a job related to the performance of his duty, the other party, within the framework of a verbal/written agreement, gives him or her It provides material or moral benefit, directly or indirectly, to the party requesting it or to another person it designates. Corruption: It is the misuse of the duties and powers possessed for the purpose of gaining direct or indirect material or moral gain, by deviating from the fulfillment of the duties and powers in accordance with the law. 3. **PRINCIPLES AND PRINCIPLES** Under the guidance of the "UN Global Compact (UNGC) (2000)", in accordance with national and international laws and regulations within the scope of combating bribery and corruption and Beyçelik Gestamp Business Ethics Rules, full compliance with the principles and principles contained in this Policy is aimed. ; No form of bribery or corruption is tolerated, regardless of its purpose. Our employees and managers in the regions where we operate are obliged to act in accordance with this Policy and to implement and support Beyçelik Gestamp's relevant procedures and controls in line with the requirements of this Policy. Beyçelik Gestamp Business Partners are also expected to comply with all laws and regulations within the scope of their activities. In this context, all Business Partners, such as suppliers, distributors and authorized services, are expected to comply with competition laws, current legislation on preventing money laundering and financing of terrorism, data privacy regulations and anti-bribery and anti-corruption laws and all other applicable legislative provisions. It is envisaged to establish an "Anti-Bribery and Anti-Corruption Compliance Program" within Beyçelik Gestamp and to carry out studies to monitor the said compliance program. Our main principles and principles regarding possible risk areas where bribery and corruption actions may occur are detailed below: 3.1. Accuracy and Transparency It is essential that all records regarding the activities carried out at Beyçelik Gestamp are kept in accordance with the legislation and standards, accurate, transparent, complete and timely, and recorded in legal books and records with sufficient explanations. Documents regarding commercial and financial transactions must reflect the real situation. No payment can be made or approved for purposes other than its intended purpose. There are effective internal control mechanisms in our business processes to prevent potential bribery and corruption risks. 3.2. Accepting and Giving Gifts Beyçelik Gestamp employees cannot give or accept any gifts of high financial value to persons and organizations with which they have business relations, or that may affect the impartiality of the other party, cause a relationship of dependency, or may be perceived as such. When in doubt on this issue, the opinion of a senior manager is sought. No discounts, donations, money, checks, goods or property, free holidays, special discounts, etc. that may be perceived as inappropriate from third parties, institutions and organizations can be accepted. They cannot demand or accept. 3.3. Avoiding Conflict of Interest Beyçelik Gestamp employees cannot take advantage of their current positions to provide benefits for themselves, their relatives and/or third parties with whom they have a business relationship, outside the employment contract, and they cannot carry out work that is contrary to the interests of the company. Beyçelik Gestamp employees are not allowed to obtain direct or indirect personal gain from purchasing and sales activities and transactions and contracts to which they are a party. Our employees; In this context, if they detect a conflict of interest or irregularity in business relations; has the obligation to immediately inform his/her superior manager and/or Beyçelik Gestamp Human, Technology and Innovation Director and/or Beyçelik Holding Ethics Board. Business Partners who have a business relationship with Beyçelik Gestamp or other persons/organizations who may have a business relationship are prohibited from having personal relationships with Beyçelik Gestamp employees that may cause or be perceived as a conflict of interest between themselves or their relatives and that may damage the corporate reputation of Beyçelik Gestamp. should not enter. 3.4. Political Activities Our employees cannot directly or indirectly use working time and company resources for personal benefit and/or political activities. If employees wish to be actively involved in any political party individually and voluntarily; They should not create a conflict of interest with their duties in the company. The relevant employee also cannot use the company name, position and company resources during these activities. It is strictly forbidden to make donations or contributions in cash or in kind to any political party in the name of Beyçelik Gestamp. 3.5. Bribery, Abuse and Abuse of Duty We refrain from accepting/giving bribes and/or commissions under any name, and from engaging in any illegal or immoral activity that will provide fraudulent behavior or unfair gain, in the regions and business areas where we operate. None of our employees may, directly or indirectly, offer, promise or give money or anything of value to any person with whom they have a business relationship, or act as an intermediary in the delivery of money or anything of value, in order to obtain unfair advantage for themselves or third parties. can't. Our employees must carefully avoid unethical behavior such as bribery, corruption and abuse of office. 3.6. Protection of Beyçelik Gestamp Assets and Data/Information Confidentiality Beyçelik Gestamp employees use the company's assets and resources, including intellectual property rights, technology, computer hardware and supports, software, real estate assets, machinery and tools, raw materials/materials, company vehicles and cash books. Cannot use extraneously or inefficiently, avoids unnecessary expenses. We expect our employees to use company assets in accordance with corporate principles and regulations. We take measures to prevent the use or damage of these assets by unauthorized third parties. Employees take care of all tangible and intangible assets of the company, including data, information and information systems, as if they were their personal property, protect them against possible loss, damage, misuse, abuse, theft and sabotage, and prevent unauthorized persons from accessing these resources and confidential information. /takes necessary precautions to prevent access to data. Beyçelik Gestamp includes commercial and financial information, technical data, product/production data, customer information and personal information, equipment and application information, technical formulas and drawings, designs, projects, system and program information, purchasing information, engineering information, regulations. , business plans and all information that the company does not disclose to the public, including but not limited to, are not called confidential but are confidential. Our employees protect all confidential information and documents they access and use them only for the benefit of the work they do for the company, within the framework of legal and business ethics rules. They may never share confidential information with third parties (even if they leave the job) for any reason or for their personal interests or third party interests. 3.7. Recruitment and Interaction with Public Officials and Politically Exposed Persons The employment process at Beyçelik Gestamp is competency-based and is not intended to encourage corruption or provide any undue benefit to a Public Official. Additionally, Public Officials and Politically Exposed Persons may be recruited or assigned to serve Beyçelik Gestamp's legitimate business purposes, provided that they meet the following criteria: Beyçelik Gestamp has no perception that the person has been hired for the purpose of obtaining improper public benefit or carrying out an act contrary to legislation. The person to be employed must have the necessary qualifications for the relevant position, the salary or other wages must be at a reasonable level and compatible with the job and the professional qualifications of the relevant person. 3.8. Facilitation Payments Beyçelik Gestamp employees and Business Partners are prohibited from making facilitation payments on behalf of Beyçelik Gestamp in the hope of accelerating or securing the outcome of work and transactions to be carried out in government institutions. Gifts, services or benefits offered to government or administrative employees or officials may be interpreted as an attempt to influence government or administrative decisions on matters affecting Beyçelik Gestamp. Persons and organizations within the scope of this policy are strictly not tolerated to take part in such facilitation payments. 3.9. Donations and Sponsorships It is possible that donations and sponsorships may be considered as bribes depending on the situation and/or may damage the corporate reputation of Beyçelik Gestamp by causing the perception of corruption. For this reason, all kinds of in-kind and cash donation requests, suggestions and requests regarding corporate social responsibility projects, and corporate support and sponsorship requests are forwarded to Beyçelik Gestamp People, Technology and Innovation Director. After the compliance of these requests with Beyçelik Gestamp strategies is evaluated, they are submitted to the approval of the Beyçelik Gestamp General Manager, together with the opinions. All donations and sponsorships made by Beyçelik Gestamp are recorded and shared transparently with stakeholders. Employees can work in non-profit, non-political organizations, social responsibility and charitable roles, provided that they do not disrupt their duties within the company. In case of participation on behalf of the company, approval is obtained from the Beyçelik Gestamp General Manager. 3.10. Relations with Third Parties Within the scope of the fight against bribery and corruption, possible irregular transactions, directly through our employees or indirectly through an agent, consultant, distributor or other third party representative acting on behalf of Beyçelik Gestamp (collectively "third parties"), "commission" to create a legal impression " or under the name of "consultancy" fee or "other expense" explanation. Situations in which we establish commercial business relations with our Business Partners are as follows: Positive completion of the Third Party Due Diligence process carried out on our Business Partners within the scope of the fight against bribery and corruption, Compliance with the necessary provisions to comply with the fight against bribery and corruption, In order not to cause a perception that the true nature of the transaction is intended to be concealed, unusual provisions and payment terms that are well above market conditions should not be included in the signed contracts. Within the scope of our internal audit activities, we check whether our purchasing transactions are reasonable according to market conditions. 3.11. Fair Competition Beyçelik Gestamp fully complies with the rules and laws regulating competition in the regions where it operates. Fair competition rules and laws prohibit written or unwritten agreements, plans, arrangements, programs between competitors involving prices, territories, market shares or customers. Our employees are prohibited from making such agreements with Beyçelik Gestamp competitors. 4. **TRAINING** Face-to-face training and e-learning applications to increase the awareness and competence of our employees and Business Partners in the fight against bribery and corruption and to internalize the principles and principles contained in this Policy. Organizational Development & Training within the Beyçelik Gestamp Human, Technology and Innovation Directorate. It is developed with the support of the Talent Management Directorate and implemented regularly every year. 5. **IMPLEMENTATION AND ENFORCEMENT** Our Anti-Bribery and Anti-Corruption Policy was published on 25.03.2024 with the approval of Beyçelik Gestamp General Manager. The policy in question is regularly reviewed by the "Beyçelik Holding Ethics Board", at least once a year, focusing on current requirements and changes in our operating conditions. Necessary updates/revisions are approved by the Beyçelik Gestamp General Manager upon the recommendation of the "Beyçelik Holding Ethics Committee" and come into force. Beyçelik Gestamp General Manager is responsible at the highest level for ensuring compliance with this Policy and regular monitoring of possible violations and suspicious situations within the scope of improvements. Any employee who believes that there is an inconsistency between the language of the policy and our activities, has questions about this policy, or wishes to report a potential violation of this policy should submit these questions and concerns to his/her immediate superior and/or to Beyçelik Gestamp's People, Technology and Innovation Director and/or It must be submitted in writing to the "Beyçelik Holding Ethics Committee". Notifications of Beyçelik Gestamp employees or third parties to the Ethics Committee are kept confidential. The review and investigation are carried out confidentially and within the framework of the Ethics Committee Working Principles. Violations of this Policy are subject to various disciplinary sanctions, which may, if necessary, lead to employees being asked to leave their jobs. Disciplinary sanctions will also be applied to those who approve of inappropriate behavior or who have knowledge of this issue but do not make the necessary notification appropriately. Our Beyçelik Gestamp Anti-Bribery and Corruption Policy is publicly available to all our stakeholders through our corporate website. as well as to all our employees via our corporate intranet site/QDMS. is offered.

PUBLICATION DATE: 15.08.2024 APPROVAL

REV. NO: 13

Chairman of the Board / CEO





## OUR DIVERSITY AND INCLUSIVITY POLICY:

### 1. PURPOSE

Beyçelik Gestamp/Çelikform Gestamp believes that diversity and inclusion are important elements in business life and aims to promote these values. Our company aims to create a work environment where diversity of talent and experience is valued, where all employees are respected regardless of their background and perspective, and where everyone can behave as themselves. In this regard, creating an inclusive company culture is among our main priorities. The Diversity and Inclusion Policy reflects Beyçelik Gestamp/Çelikform Gestamp's commitment to these values in its workforce. This policy is compatible with the ethical principles and working life standards that apply to all employees and business partners in our company and our affiliates.

2. DEFINITION Diversity: It is a broad concept that expresses the differences of people. Everything that makes individuals unique is part of the definition of diversity. Inclusion: A process that leverages the richness of ideas, backgrounds, and perspectives to transform diversity into business value, creating an environment of inclusion, respect, and connection.

3. POLICY Beyçelik Gestamp/Çelikform Gestamp values the differences of the people it works with and offers a working environment where everyone is respected and feels like they belong. Our company is committed to observing equality of opportunity in all its processes; Recruitment, placement, development, training, remuneration and promotion decisions are made based on the employee's qualifications, performance, skills and experience. In this system, where performance and contribution to corporate success are appreciated, cultural diversity and equality of opportunity are encouraged. The presence of employees who have different characteristics and feel that they belong to the organization is essential for the company to achieve its business goals. That's why we strive to attract, develop and retain open-minded talent with diverse backgrounds and experiences. Beyçelik Gestamp/Çelikform Gestamp aims to create an environment where employees will feel valued and safe, and where they will be free in the field of creativity and innovation.

3.1. Equal Opportunity and Diversity in Recruitment The basis of our recruitment policy is valuing people and information, objective evaluation and equality of opportunity. We select our employees solely based on their professional competencies and qualifications, regardless of their age, gender, race, color, language, religion, philosophical and political opinion, ethnic origin, economic situation, health status, disability, appearance, life and clothing style, sexual orientation, We recruit and support them to reveal their potential. We support selection and placement decisions and ensure equality of opportunity through competency and talent-based assessment and evaluation practices.

3.2. Inclusion and Diversity in Education and Career Development Beyçelik Gestamp/Çelikform Gestamp adopts an inclusive stance in its leadership culture and management approaches. During training and career development processes, we develop and implement programs for all employees to realize their potential by offering them opportunities that suit their needs. We take into consideration the opinions and suggestions of our employees and support a participatory culture by creating platforms where these suggestions can be expressed. We invest in training and development and establish collaborations in order to train qualified human resources for the sector. We equip our employees to manage diversity and inclusion.

3.3. Communication Approach We oppose the use of sexist, racist, discriminatory and stereotype-reinforcing language and behavior in all communication processes. We encourage open, fair and non-violent forms of communication and adopt an egalitarian communication policy.

3.4. Business Partners In all our relationships with business partners and stakeholders, we take care to cooperate with institutions that are egalitarian and value diversity. We see diversity and inclusion as an opportunity for development for both the company and society. With this understanding, we convey the principles of diversity and inclusion to our business partners and expect them to comply with these principles. We support our stakeholders to become ambassadors in society on this issue by developing their own good examples.

3.5 Implementation and Enforcement Our Diversity and Inclusion Policy has been published with the approval of Beyçelik Gestamp General Manager. The policy in question is regularly reviewed by the "Beyçelik Holding Ethics Board", at least once a year, focusing on current requirements and changes in our operating conditions. Necessary updates/revisions are approved by the Beyçelik Gestamp General Manager upon the recommendation of the "Beyçelik Holding Ethics Committee" and come into force. Beyçelik Gestamp General Manager is responsible at the highest level for ensuring compliance with this Policy and regular monitoring of possible violations and suspicious situations within the scope of improvements. Any employee who believes that there is an inconsistency between the language of the policy and our activities, has questions about this policy, or wishes to report a potential violation of this policy should submit these questions and concerns to his/her immediate superior and/or to Beyçelik Gestamp's People, Technology and Innovation Director and/or It must be submitted in writing to the "Beyçelik Holding Ethics Committee". Notifications of Beyçelik Gestamp employees or third parties to the Ethics Committee are kept confidential. The review and investigation are carried out confidentially and within the framework of the Ethics Committee Working Principles. Violations of this Policy are subject to various disciplinary sanctions, which may, if necessary, lead to employees being asked to leave their jobs. Disciplinary sanctions will also be applied to those who approve of inappropriate behavior or who have knowledge about it but fail to make the necessary notification. Our Diversity and Inclusion Policy is publicly available to all our stakeholders via our corporate website, as well as to all our employees via our corporate intranet site/QDMS.

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