

ÇAKIRLAR PRINTING BUSINESS

ETHICS POLICY

1. Purpose

This policy outlines Çakırlar Printing's commitment to ethical business practices and its determination to apply high standards in these areas. Our company defines and implements its ethical values as guiding principles for all stakeholders, including employees, business partners, and suppliers. This policy covers the company's expectations and responsibilities in areas such as corruption, bribery, conflicts of interest, fraud, money laundering, information security, data privacy, and human rights.

2. Scope

This policy applies to all areas in which Çakırlar Printing operates, including employees, managers, suppliers, customers, and other stakeholders. The foundation of this policy is our goal of strengthening ethical principles and integrating them into all operational processes, including the supply chain.

Additionally, this policy aims to serve as a practical guide for all individuals and institutions that may be affected by Çakırlar Printing's activities. Legal and administrative sanctions may be applied to those who violate the established standards and rules.

3. Commitments

Çakırlar Printing embraces the responsibility to uphold and develop ethical business practices in compliance with national and international laws and regulations. We are committed to respecting and protecting the rights of our employees, suppliers, and stakeholders based on international standards and best practices. Below are our key ethical commitments:

3.1. Anti-Corruption and Anti-Bribery:

- Zero tolerance policy for all forms of corruption and bribery.
- All business transactions and agreements will be conducted with transparency and integrity.
- Risk analyses will be conducted company-wide to develop effective measures against bribery and corruption.

3.2. Management of Conflicts of Interest:

- Employees must avoid any personal interest that conflicts with company interests.
- Any potential conflict must be reported to management immediately.
- Risks will be monitored through regular audits and awareness training.

3.3. Data Privacy and Information Security:

- Confidentiality of customer, supplier, and employee data is a core value.
- Data protection practices will comply with national and international legislation.
- Advanced technological solutions will be used to mitigate data breach risks, with regular cybersecurity testing.

3.4. Prevention of Fraud and Money Laundering:

- Zero tolerance for fraud and money laundering in all activities.
- Regular audits and training programs will be implemented to reduce risks.
- Internal reporting systems will ensure quick detection of fraud cases.

3.5. Transparency:

- Transparency is a core principle in all our business processes.
- Company policies and decision-making processes will be openly shared with employees and stakeholders.
- Financial reporting will comply with international accounting standards.

3.6. Gifts and Hospitality Policy:

- Gift-giving and hospitality activities will be limited so as not to influence business relationships.
- Only symbolic-value gifts may be accepted by employees or partners.
- All received gifts must be reported to management.

3.7. Fair Competition:

- We commit to ethical and honest competition.

- We will refrain from spreading misleading information about competitors and will comply with competition laws.
- Annual fair competition and ethics training will be provided to employees.

3.8. Personal Data and Privacy:

- The privacy of personal data for employees, customers, and business partners is a top priority.
- Data will only be collected and processed for specific purposes.
- All data protection processes will fully comply with applicable regulations.

3.9. Social Media Use:

- Employees must protect the company's reputation and ethical values when using social media.
- Public posts about the company must be made using a professional tone.

4. Application Principles

Çakırlar Printing adopts a strong application framework to implement its business ethics commitments. Our company aims to create an ethical, safe and inclusive work culture, while accepting respect for the privacy and rights of all its stakeholders as a fundamental principle. Our principles applied within this scope are as follows:

- **Effective Policy Implementation:**
All our employees are ensured to understand the business ethics policy and integrate it into their business processes. Each department is responsible for complying with ethical principles in their own activities and regular performance evaluations are carried out.
- **Use of Anonymous Ethics Line:**
An anonymous and secure ethical violation reporting line has been established for employees, customers or business partners. The confidentiality of the reports is strictly maintained and evaluated impartially.
- **Risk Assessments and Audits:**
Ethical risks (especially bribery, corruption and information security) are regularly analyzed and prioritized. The effectiveness of the policy is evaluated and reported through internal audit mechanisms.
- **Education and Awareness:**
All employees receive regular training on ethical policies and practices. Mandatory introductory training is provided for new employees and annual updates are provided

for existing employees. Compliance with ethical rules is increased through awareness campaigns.

- **Transparency and Disclosure:**

Our ethics policy is clearly communicated to our employees and stakeholders via the internal company portal, meetings and e-mail. Policy updates are announced regularly and implementation results are shared in annual reports. The ethics policy is also available on the Company's corporate website.

- **Supply Chain Compliance:**

Suppliers are assessed for compliance with ethical policy requirements. Compliance is ensured through ethical commitments integrated into business partnership agreements and regular audits are conducted.

- **Feedback Mechanisms:**

Feedback mechanisms have been established for employees, customers and business partners. These feedbacks are regularly analyzed and contribute to the development of the policy.

- **Crisis and Emergency Management:**

Crisis management plans are implemented to provide a rapid and effective response to crisis situations that are not in compliance with ethical principles. In these processes, the ethics committee comes into play and transparency is the basis.

- **Management of Complaints:**

Complaints are handled impartially and a transparent investigation process is conducted. Complainants are informed in a timely manner and the results obtained from complaints are included in continuous improvement processes.

Çakırlar Printing is committed to conducting all operations in a sustainable manner in line with these principles and placing business ethics at the center of the company culture. Our ethics hotline and other reporting mechanisms are the basic tools that protect the rights of our employees and business partners.

5.Goals

Çakırlar Printing has set specific and measurable goals to embody its business ethics commitments. These goals are supported by annual evaluation processes and aim for the company to take on an exemplary role in the sector regarding ethical business practices.

5.1. Bribery and Corruption

- Increasing the rate of employees who have completed anti-bribery and anti-corruption training to 100% by the end of 2025.
- To establish an internal audit mechanism that supports a culture of transparency and ethical behavior in all business processes.

5.2. Conflict of Interest

- Ensure that 80% of employees complete conflict of interest awareness training by the end of 2025.

5.3. Fraud and Money Laundering

- Conducting detailed reviews of at least 2 financial transactions and supplier relationships per year.
- Developing and implementing early warning systems to reduce the risks of fraud and money laundering within the company.

5.4. Information Security

- Organizing annual information security awareness training for employees.
- Not to receive any complaints about information security in 2025.

5.5. Fair Competition

- Increasing the rate of employees receiving training on competition law and ethical rules to 80% by the end of 2025.
- Strengthen a company culture that supports honest and ethical business practices.

5.6. Personal Data and Privacy

- Conducting internal audits on data protection and privacy issues at least twice a year and reporting the results to the board of directors.
- Providing regular training to increase data privacy awareness among employees, customers and business partners,

5.7. Feedback mechanisms

- Continuing to effectively use anonymous feedback boxes where employees, customers and business partners can easily submit their requests and complaints, and identifying areas for development through annual analyses.
- Responding to notifications made to corporate reporting lines within 30 business days.

6. Source

Çakırlar Printing adopts the following national and international standards, principles and guides as sources within the framework of its business ethics policy:

- United Nations Global Compact
- OECD Guiding Principles for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) Core Labour Standards
- International Chamber of Commerce (ICC) Anti-Corruption Code of Conduct

- Transparency International Principles of Business Ethics
- GDPR (General Data Protection Regulation)
- United Nations Sustainable Development Goals (SDGs), especially SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry, Innovation and Infrastructure), SDG 16 (Peace, Justice and Strong Institutions) and SDG 17 (Partnerships for the Goals)
- Law No. 6698 on the Protection of Personal Data

7. Responsible Persons and Review

This policy has been prepared by Çakırlar Printing Human Resources Department by taking the opinions of employees, suppliers, customers and other stakeholders. The Ethics Committee is responsible for the implementation of the policy, monitoring and continuous development of business ethics standards, and the evaluation and resolution of complaints, reports and claims received through the reporting lines.

The effectiveness and suitability of the policy will be reviewed regularly every year. In this process, board approval, stakeholder feedback and performance data will be taken into account. The review process will be structured to evaluate the extent to which the policy has achieved its goals and its effectiveness.

In case of changes in the company organization, innovations in national and international legislation or new challenges regarding business ethics and human rights, the policy will be revised and these changes will be shared transparently with all stakeholders. In addition, the policy will be reviewed in detail once a year.

8. Ethics Committee

The Ethics Board is chaired by the Deputy General Manager of Çakırlar Printing and its members are the Production Manager, Human Resources Manager, Quality Assurance Officer and Legal Affairs Manager. The duty of the Ethics Board is to carry out all kinds of work deemed necessary for the implementation of the policy, monitoring and continuous development of business ethics standards, and to coordinate training programs for those assigned and employees in this regard or to cooperate with expert organizations in these matters.

The duties of the Board are as follows:

- Establishing, updating, publishing and ensuring the applicability of ethical principles,
- Planning and implementing ethics training for employees,
- Conducting awareness-raising programs,
- Analyzing ethical risks and opportunities,
- Regularly monitoring policy targets and performance indicators,
- Evaluating and resolving complaints, notifications and requests received through reporting lines.

9. Implementation of Discipline

In case of violation of the General Code of Ethics, the penalties in the disciplinary procedure are applied:

- If the violation detected was committed knowingly, dismissal and, if deemed necessary, legal proceedings shall be initiated in accordance with the relevant articles of the Labor Law.
- If the violation is due to carelessness, negligence or ignorance, a written warning appropriate to the impact of the incident shall be given.
- Past beneficial deeds of the person who knowingly provided unfair benefit shall not constitute a partial or complete excuse for the decision to be made.

Approved by: ORHAN ÇAKIRLAR
GENERAL MANAGER