

ÇAKIRLAR PRINTING COMPANY BUSINESS ETHICS POLICY

1. Objective

This policy has been prepared to demonstrate Çakırlar Matbaacılık's commitment to ethical business practices and its determination to implement high standards in these areas. Our company defines and implements its ethical values to guide all stakeholders, including employees, business partners, and suppliers. This policy covers our company's expectations and responsibilities regarding corruption, bribery, conflicts of interest, fraud, money laundering, information security, data privacy, and human rights.

2. Scope

This policy applies to all areas of operation of Çakırlar Matbaacılık and covers our employees, managers, suppliers, customers, and other stakeholders. The company's goal of strengthening business ethics principles and integrating them into all operational processes, including the supply chain, forms the basis of this policy. Furthermore, this policy aims to provide a guideline applicable to all individuals and organizations that may be affected by Çakırlar Matbaacılık's activities, and reserves the right to apply legal and administrative sanctions against parties that violate the established standards and rules.

3. Commitments

Çakırlar Matbaacılık adopts the responsibility of protecting and developing ethical business practices within the framework of laws and international regulations in all areas of its operations. Our company is committed to respecting and effectively protecting the fundamental rights of its employees, suppliers, and other stakeholders in line with international standards and best practices. In this context, it adopts the following commitments regarding business ethics practices:

3.1. Combating Corruption and Bribery:

- Çakırlar Printing operates with a zero-tolerance principle towards all forms of corruption and bribery.
- All commercial transactions and agreements will be conducted on the basis of transparency and honesty.
- Company-wide risk analyses will be conducted to develop effective measures against bribery and corruption.

3.2. Managing Conflicts of Interest:

- Employees must ensure that their personal interests do not conflict with company interests.
- Potential conflicts of interest will be reported to management immediately.
- Risks will be monitored through periodic audits and awareness training.

3.3. Data Privacy and Information Security:

- The confidentiality of customer, supplier, and employee information is one of our core values.
- Data protection practices will be carried out in accordance with national and international legislation.
- Advanced technological solutions will be implemented and regular cybersecurity tests will be conducted to reduce the risk of data breaches.

3.4. Preventing Fraud and Money Laundering:

- A zero-tolerance policy is adopted for fraud and money laundering in all activities.
- Periodic audits will be conducted and training programs will be organized to mitigate potential risks.
- Fraud cases will be detected quickly through internal reporting systems.

3.5. Transparency:

- Transparency is our fundamental principle in all business processes.
- Company policies and decision-making processes will be communicated openly to all employees and stakeholders.
- Financial reporting will be prepared in accordance with international accounting standards.

3.6. Gift and Hospitality Policy:

- Gift-giving and hospitality activities will be limited in a way that does not affect business relationships.
- Employees and business partners may only accept gifts of symbolic value.
- All gifts received by employees will be shared with management.

3.7. Fair Competition:

- We are committed to ensuring that competition is conducted ethically and fairly.
- We will refrain from spreading misleading information about competitors, and all practices will comply with competition laws.
- Employees will receive annual training on competition ethics.

3.8. Personal Data and Privacy:

- The privacy of personal data of employees, customers and business partners is our top priority.
- Data is collected and processed only for specific purposes.
- Data protection processes are carried out in full compliance with national and international legislation.

3.9. Social Media Usage:

- Employees are responsible for protecting the company's reputation and ethical values when using social media.
- Public posts about the company will be made in a professional manner.

These commitments form the basis of Çakırlar Matbaacılık's business ethics principles.

4. Application Principles

Çakırlar Printing adopts a strong framework for implementing its business ethics commitments. Our company aims to create an ethical, safe, and inclusive work culture, while respecting the privacy and rights of all stakeholders as a fundamental principle. Our principles implemented within this framework 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 compliance with ethical principles in its own activities, and regular performance evaluations are conducted.
- **Anonymous Ethics Hotline:** An anonymous and secure ethics violation reporting hotline has been established for employees, customers, or business partners. The confidentiality of all reports is strictly protected, and they are evaluated impartially.
- **Risk Assessments and Audits:** Ethical risks, particularly bribery, corruption, and information security risks, are regularly analyzed and prioritized. Technical and administrative control procedures aimed at preventing information security breaches are regularly audited, tested, and reviewed. The effectiveness of the policy is evaluated and reported through internal audit mechanisms; necessary corrective actions are implemented for identified nonconformities.
- **Training and Awareness:** Regular training on ethical policies and practices is provided for all employees. Mandatory initial training is provided for new employees, and annual updates are provided for existing employees. Commitment to ethical rules is increased through awareness campaigns.
- **Transparency and Information:** Our ethics policy is clearly communicated to our employees and stakeholders through the internal portal, meetings, and email. 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 evaluated to ensure they meet the requirements of the ethics policy. 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. This feedback is regularly analyzed and contributes to the improvement of the policy.
- **Crisis and Emergency Management:** Crisis management plans are implemented to provide a rapid and effective response in crisis situations that are inconsistent with ethical principles. The incident is recorded, brought under control, necessary notifications are made, and corrective actions are implemented. The ethics committee is involved in these processes, and transparency is prioritized.
- **Complaints Management:** 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 incorporated into continuous improvement processes. Çakırlar Matbaacılık is committed to conducting all its operations sustainably in line with these principles and placing business ethics rules at the center of its corporate culture. Our ethics hotline and other reporting mechanisms are fundamental tools that protect the rights of our employees and business partners.

5.Objectives

Çakırlar Matbaacılık has established specific and measurable goals to concretize its commitment to business ethics. These goals are supported by annual evaluation processes, aiming for the company to take on a model role in ethical business practices within the sector.

5.1.Bribery and Corruption

- Providing 100% of employees with anti-bribery and corruption training by the end of 2026.
- Establishing an internal audit mechanism that supports a culture of transparency and ethical behavior in all business processes.
- Conducting internal audits on bribery and corruption twice a year.

5.2. Conflict of Interest

- Providing 100% of employees with conflict of interest awareness training by the end of 2026
- Obtaining annual conflict of interest statements from 100% of employees by the end of 2030

5.3. Fraud and Money Laundering

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

5.4. Information Security

- Providing 100% of employees with information security and data privacy training by the end of 2026
- Receiving no information security-related complaints in 2026.
- Recording 100% of information security incidents within 24 hours
- Completing root cause analysis and corrective action within 30 days for 100% of serious information security incidents
- Conducting internal audits on information security twice a year

5.5. Fair Competition

- Providing 100% of employees with competition law and ethics training by the end of 2026
- Referring 100% of notifications that carry a risk of competition violation to the Ethics Committee for review
- Strengthening 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 twice a year.
- Providing 100% of employees with personal data protection training by the end of 2026.
- Offering regular training to increase data privacy awareness among employees, customers, and business partners.

5.7. Feedback Mechanisms

- To continue effectively utilizing anonymous feedback boxes where employees, customers, and business partners can easily submit requests and complaints, and to identify areas for improvement through annual analyses.
- To respond to reports made through corporate reporting lines within 30 business days.

6.Source

Çakırlar Printing House adopts the following national and international standards, principles, and guidelines 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) Basic Labour Standards
- International Chamber of Commerce (ICC) Rules for Combating Corruption
- Transparency International Business Ethics Principles
- 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.Those Responsible and Review

This policy, prepared by the Human Resources Department of Çakırlar Matbaacılık, is developed by taking into account the views of employees, suppliers, customers, and other stakeholders. The Ethics Committee is responsible for the implementation of the policy, monitoring and continuous improvement of business ethics standards, and the evaluation and resolution of complaints, reports, and allegations received through reporting lines. The effectiveness and suitability of the policy are reviewed regularly every year. Board approval, stakeholder feedback, and performance data are taken into account in this process. The review process is structured to evaluate the extent to which the policy has achieved its objectives and its effectiveness in practice. The policy is revised as needed in line with changes in the company organization, updates in national and international legislation, or new risks and challenges arising in the field of business ethics and human rights. Changes are shared transparently with all stakeholders. Records of training, declarations, notifications, reviews, audits, and corrective actions carried out under this policy are regularly maintained. These records are periodically reviewed by the Ethics Committee and used in evaluating the effectiveness of the policy. Indicators deemed appropriate are considered in annual performance evaluations.

8.Ethics Committee

The Ethics Committee of Çakırlar Printing House is chaired by the Deputy General Manager, and its members are the Production Manager, Human Resources Manager, Quality Assurance Officer, and Legal Affairs Manager. The Ethics Committee is responsible for undertaking all necessary work to ensure the implementation of the policy, the monitoring and continuous improvement of business ethics standards; coordinating training programs for those assigned to this task and employees, or collaborating with expert organizations in these areas. The Committee's duties include:

- 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 objectives and performance indicators,
- Evaluating and resolving complaints, reports, and allegations received through reporting lines.

9.Disciplinary Action

Following violations of the General Code of Ethical Conduct, the following penalties are applied in the disciplinary procedure:

- If the detected violation is determined to have been committed knowingly, dismissal from work and, if deemed necessary, legal proceedings are initiated in accordance with the relevant articles of the labor law.
- If the violation arises from carelessness, negligence, or lack of knowledge, a written warning appropriate to the impact of the event is given.
- The fact that a person who knowingly obtained an unfair advantage has performed beneficial work in the past does not constitute a partial or complete excuse for the decision.

10.Employee Consent and Commitment

All employees, upon hiring and following policy revisions, acknowledge in writing or electronically that they have read, understood, and agree to abide by the terms of this policy. This acknowledgment process is renewed periodically for roles and positions deemed necessary.

11.Appendices

11.1.Business Ethics Practice Guide and Frequently Asked Questions

Q1. Can I accept a gift from a supplier?

Only low-value gifts that do not influence business decisions, are in line with local custom, and do not exceed policy limits are acceptable. Cash, gift cards, high-value gifts with personal benefits, and gifts offered during bidding/purchasing/contract renewal periods are unacceptable. Offers exceeding the limit are reported to management and recorded.

Q2. Is it a violation if a supplier invites me to a meal?

Reasonable, transparent, and infrequent hospitality that does not affect the business relationship is acceptable. It is unacceptable if there is ongoing business negotiation, bidding, or price bargaining. All appropriate hospitality is recorded.

Q3. My relative's company wants to become a supplier. What should I do?

This is a conflict of interest. You must notify management and the Ethics Committee in writing before engaging in the process. The evaluation must be conducted by independent individuals.

Q4. Can I send customer or supplier data to my personal email account?

No. Data sharing is not permitted outside of company-approved systems. Personal accounts, unauthorized applications, and unprotected devices are not permitted.

Q5. What should I do if I notice a suspicious payment or forged document?

You must report the situation immediately to your supervisor, the Ethics Committee, or the whistleblowing channel. No action will be taken until the investigation is complete.

Q6. Can I make an anonymous report?

Yes. Reports can be made with or without a name. No retaliation can be made against a person who makes a report in good faith.

Q7. Is it acceptable to obtain or share price information from a competitor?

No. Sharing commercially sensitive information such as price, capacity, customer sharing, and bidding strategy with competitors, which could distort competition, is prohibited.

Q8. Is it acceptable to expedite the process by making a small payment to a public official?

No. Facilitation payments are also considered bribery and are prohibited.

Q9. Can I temporarily change company records to correct a minor error later?

No. All records must be accurate, complete, traceable, and timely. Deliberately false records are a serious breach.

Q10. What ethical guidelines apply when working with a third-party consultant or agent?

All third parties acting on behalf of the company are subject to this policy. Risk-based due diligence, contractual ethical provisions, and audits are applied as needed.

Q11. What is an information security incident?

Unauthorized access, data leakage, sending emails to the wrong person, malware, password sharing, or system access breaches are information security incidents and must be reported immediately.

Q12. What happens in case of a policy violation?

Depending on the nature of the violation, a written warning, reassignment, withdrawal from the process, termination of employment, and, where necessary, legal action may be taken.

11.2. Case-Based Examples

• Case 1: Attempted Bribery

Situation: An employee working in the purchasing department is offered a valuable gift (e.g., an expensive electronic device) by a supplier in order to maintain an ongoing business relationship.

Assessment: Such offers are considered bribery or an attempt to gain advantage. It is essential that employees do not accept such gifts and immediately reject the offer. The incident should be reported to management or the Ethics Committee.

• Case 2: Use of the Whistleblower Mechanism

Situation: An employee suspects that some financial transactions carried out within the company are not in accordance with company procedures; however, they are hesitant to report the situation directly to their manager.

Assessment: In this case, the employee can report the situation anonymously through the Ethics Hotline or relevant reporting channels. The company protects the confidentiality of employees who report in good faith and will not allow any retaliation against those who report.

• Case 3: Sharing Information on Social Media

Situation: An employee shares a photo of the production area on their social media account. The photo shows information about machines and products.

Evaluation: Information about machines, processes, or products in the production area is considered within the scope of the company's commercial and operational information. Sharing such information on social media or with third parties constitutes a violation of information security and privacy rules. Employees are required to obtain the necessary permissions and comply with privacy policies before sharing photos and images taken in company areas.

• Case 4: Conflict of Interest

Situation: An employee involved in the procurement process knows that one of the bidding firms belongs to a close relative, but does not report this to their managers and continues to participate in the evaluation process.

Assessment: This situation is considered a conflict of interest. It is essential for employees to immediately report to their managers and the Ethics Committee any situations that may create a commercial relationship involving themselves or their relatives. Employees with conflicts of interest are removed from the relevant decision-making and evaluation processes. Adherence to the principles of transparency and impartiality is mandatory.

• Case 5: Gifts and Hospitality

Situation: A supplier wants to host an employee in the procurement unit at an expensive restaurant and give them event tickets as a gift during an ongoing tender process.

Assessment: Gifts and hospitality offered during ongoing tender or decision-making processes carry risks that may affect impartiality. Such offers are not accepted and are politely declined. It is essential to report the incident to managers or the Ethics Committee.

• Case 6: Use of Company Assets

Situation: An employee regularly uses the company computer and printer for personal business and small commercial jobs they obtain from outside sources.

Assessment: Company assets are for business purposes only. Using company equipment for personal business activities is against ethical rules and company policies. Such situations are reported to managers or the Ethics Committee.

• Case 7: Impartiality in Supplier Selection

Situation: A manager explicitly expresses a preference for a particular supplier during the bidding process and asks the team to prioritize that firm.

Assessment: Supplier selection processes are based on transparent, objective, and competitive criteria. Decisions made based on personal preference or pressure are unacceptable. Compliance with established purchasing procedures and ethical principles is mandatory in decision-making processes.

• Case 8: Sharing Confidential Information

Situation: An employee shares company quotes and customer information with a colleague working at another company.

Assessment: Company business information, customer data, and pricing information are considered confidential. Sharing this information with third parties constitutes a violation of information security and ethical principles. Employees are required to adhere to confidentiality rules.

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