

CODE OF CONDUCT

OUR COMMITMENT,
OUR RESPONSIBILITY



INTEGRITY

We act with honesty



RESPECT

We respect people



TRUST

We build trust



SUSTAINABILITY

We care for the future



RESPONSIBILITY

We take responsibility

ALCAS METAL SANAYİ A.Ş.

Aluminum Extrusion and Façade Systems

📍 Ergene / Tekirdag / Türkiye

🌐 Export-oriented production to Europe and America

♻️ Sustainable and quality-focused production

“

Quality is not only in our products;
it is also a **standard** in our behavior.

”



ETHICS & COMPLIANCE

We act ethically and in compliance with the law.



INFORMATION SECURITY

We protect information and ensure confidentiality.



VERSION
1.0



ISSUE DATE
May 2026



INTERNAL USE & CORPORATE
REFERENCE DOCUMENT
For internal use only

1.1 Our Commitment to Compliance and Integrity

The Code of Conduct reflects our commitment to maintaining ethical business practices and compliance throughout our global organization wherever we operate and conduct business on behalf of Alcas Metal.

This Code of Conduct establishes a fundamental framework that supports our efforts to do what is right and ensures that we always act with integrity. It is also designed to help you make the right decisions for both yourself and Alcas.

As an Alcas employee, you are required to comply with the rules set forth in the Code of Conduct and to exercise sound judgment, due care, and diligence in all work you perform for the Company.

This version of the Code of Conduct supersedes all previous versions and has been approved by the management of Alcas Metal San. A.Ş.

Application of the Code of Conduct

As a global company, we are required to act in compliance with the laws and regulations of the countries in which we operate.

References in this Code of Conduct to “Alcas” or the “Company” refer to Alcas Metal Sanayi A.Ş. and its wholly owned subsidiaries.

The Code of Conduct applies to:

- All Alcas employees, regardless of geographic location,
- Individuals acting on behalf of or representing Alcas, including:
 - Temporary personnel,
 - Consultants,
 - Other individuals,
- Members of Alcas governing bodies.

In addition, it applies to employees of partially owned companies to the extent that it has been approved by the governing body of the respective company.

In legal entities where Alcas does not hold 100% of the voting rights, board members or other governing body representatives representing Alcas shall:

- Act in accordance with the Alcas Code of Conduct,
- Make efforts to ensure the implementation of the principles set forth in this document.

1.2 Our Responsibilities

All employees are expected to contribute to Alcas's ethical culture by understanding the Company's Code of Conduct and embracing the Company's commitment to compliance and integrity.

Employees shall:

- Ensure the implementation of compliance requirements,
- Strive to prevent any violations.

You must refrain from acting contrary to this Code of Conduct or encouraging others to do so, even if such actions may appear to be in the best interest of the Company under certain circumstances.

Employee Responsibilities

As an Alcas employee, you are expected to conduct your work with honesty and transparency and to demonstrate commitment to the highest ethical standards in your relationships with customers, business partners, colleagues, and other stakeholders.

Each employee has the following responsibilities:

- To always act in compliance with the Code of Conduct, other corporate governance documents, business rules, and applicable laws and regulations,
- To avoid any activity that may appear unethical or unlawful,
- To promptly ask questions and seek guidance whenever uncertain about any part of the Code of Conduct or when faced with an ethical situation,
- To report without delay any suspected violations of the Code of Conduct, other corporate documents, business rules, or any laws/regulations,
- To cooperate fully and honestly in internal Company investigations,
- To never retaliate against anyone who raises a concern in good faith,
- To participate in mandatory compliance trainings.

Responsibilities of Leaders, Managers, and Supervisors

At Alcas, leaders, managers, and supervisors are accountable and are responsible for ensuring that activities within their areas of responsibility are conducted in compliance with the Code of Conduct, other corporate governance documents, and applicable laws and regulations.

Alcas leaders, managers, and supervisors shall:

- Lead by example and serve as role models who encourage employees to comply with the Code of Conduct and conduct business with honesty, transparency, and integrity,
- Clearly communicate the requirements of the Code of Conduct to their teams and ensure that these standards are understood and implemented,
- Continuously emphasize the importance of ethics and compliance,
- Create a trust-based working environment where employees feel comfortable raising concerns and provide the necessary support and guidance,
- Foster an ethical culture that promotes compliance, encourages employees to raise questions and concerns, and strictly prohibits retaliation,
- Promptly address employee concerns regarding potential violations and, where necessary, immediately escalate the matter to:
 - the Plant Manager,
 - the Employer Representative,
 - Human Resources,
 - the Legal Department,
- Recognize and reward employees who adopt and promote compliant and ethical behavior.

Certification (Acknowledgement Process)

All employees are required, at specified intervals, to formally acknowledge that they have read and understood the Code of Conduct, agree to comply with these rules, and undertake to report any violations through the available reporting channels.

1.3 Seeking Guidance, Raising Concerns, and Reporting Suspected Violations

Alcas is committed to fostering a culture of trust in which employees feel comfortable asking questions, seeking guidance, raising concerns, and reporting suspected violations.

Your questions and concerns will be taken seriously, and you are encouraged to raise them in good faith.

Providing concrete and detailed information regarding your concern will facilitate the proper assessment of the matter and the implementation of necessary actions.

Whistleblowing Mechanism and Reporting Obligation

As Alcas, we encourage all employees and stakeholders to report ethical violations, improper conduct, and suspicious situations without delay.

Our Company is committed to establishing a transparent and trust-based working environment that supports open communication.

Reporting Obligation

All employees are obligated to immediately report:

- Ethical violations,
- Conduct contrary to the Code of Conduct,
- Non-compliance with laws and regulations,
- Environmental complaints,
- Human rights-related concerns.

Reporting Channels

Employees are primarily expected to raise their concerns directly with their managers or supervisors.

However, alternative reporting channels may be used in the following situations:

- If the employee feels uncomfortable reporting the matter to their manager,
- If the employee believes that the reported matter has not been adequately addressed.

In such cases, employees may contact:

- Senior management representatives,
- Human Resources,
- Occupational Health and Safety,
- The Employer Representative,
- Employee representatives.

In addition, complaints may be submitted by sending an e-mail to ethics@alcas.com.tr or by placing named or anonymous reports into the complaint boxes located at various points within the factory.

Confidentiality and Anonymity

Alcas:

- Commits to maintaining the confidentiality of the identity of individuals making reports,
- Allows anonymous reporting where necessary.

Protection Against Retaliation

No employee who makes a report in good faith shall be subjected to pressure, discrimination, dismissal, or any similar adverse treatment.

Investigation and Follow-Up Process

All reports submitted shall:

- Be assessed in an impartial and independent manner,
- Be subject to a formal investigation where necessary,
- Result in appropriate corrective and preventive actions being taken.

Employee Participation

Where necessary, the complainant or their representative:

- Shall be involved in the resolution process,
- Shall be provided with feedback.

Complaints are evaluated by the Alcas Disciplinary Committee with the support of an independent third-party service provider.

Zero Tolerance Against Retaliation and False Reporting

Alcas maintains zero tolerance against retaliation toward anyone who, in good faith, asks questions, raises concerns, reports a suspected violation, or participates in an internal investigation.

Good faith means that the individual genuinely believes that a legitimate issue exists.

Retaliation means taking adverse action against a person for reporting a concern or creating an environment that discourages individuals from speaking up. Retaliating against a person for making a report constitutes a violation of this Code of Conduct.

On the other hand, intentionally false and malicious reports are also not tolerated. Individuals who knowingly engage in retaliation or knowingly submit false reports may be subject to disciplinary sanctions, including termination of employment.

If there is any suspicion of retaliation in the workplace, the matter must immediately be reported by sending an e-mail to ethics@alcas.com.tr or through other available reporting channels.

1.4 Violations and Accountability

Under no circumstances are you authorized to engage in unlawful or unethical conduct, even if such conduct may appear to be in the interest of the Company or if you have been instructed to do so by a manager, supervisor, or another employee.

Violations of the law may, where necessary, be reported to the relevant authorities.

Violations of this Code of Conduct are strictly unacceptable and may result in serious consequences for both you and Alcas. Such consequences may include disciplinary sanctions (including termination of employment), criminal prosecution, substantial fines and penalties, and reputational damage.

Violations may also jeopardize our relationships with customers, employees, regulatory authorities, and business partners, and may result in the loss of our ability to conduct business.

1.5 Ethics Committee and Ethics Officer

Alcas establishes an independent Ethics Committee and appoints an Ethics Officer in order to ensure the effective implementation of the ethical management system. The Ethics Committee is responsible for evaluating ethical violations, managing complaint processes, conducting necessary investigations, and determining corrective and preventive actions.

The Ethics Officer performs their duties in an impartial and independent manner and shall not be subject to the instructions of any person, department, or management body. Any attempt to pressure, direct, or improperly influence the Ethics Officer in relation to their duties is unacceptable.

The Ethics Committee evaluates the effectiveness of the complaint mechanism at least once every 12 months, plans necessary improvements, and maintains related records.

Complaint Process and Follow-Up

Complaints and ethical reports submitted to Alcas are recorded and assessed as soon as reasonably possible. The complainant shall receive an acknowledgement confirming receipt of the report.

The complaint process generally proceeds as follows:

The receipt and registration of the complaint are completed within approximately 1–3 business days, the preliminary assessment process is completed within approximately 7 business days, and where deemed necessary, the investigation process is completed within approximately 30 days.

At the conclusion of the process, the necessary corrective and preventive actions are planned and, where appropriate, feedback is provided to the complainant.

2.1 Human Rights and Labour Rights

Alcas is committed to respecting and promoting the human rights of all individuals who may be directly or indirectly affected by its activities.

Alcas supports and respects internationally recognized labour rights, including freedom of association and the right to collective bargaining, within the framework of the Constitution of the Republic of Türkiye and applicable legislation.

In addition, we oppose all forms of human trafficking and the exploitation of child labour, and we neither use nor participate in any form of forced or compulsory labour.

Wages, Benefits, and Working Hours

Alcas undertakes to act in compliance with all applicable legal regulations and industry requirements regarding employee wages, fringe benefits, overtime practices, leave entitlements, and social benefits.

Working hours, overtime periods, rest rights, and holiday practices are regulated and implemented in accordance with applicable national legislation.

2.2 Working Conditions, Equal Opportunities, and Respect

Diversity, Inclusion, and Belonging in the Workplace

Alcas is committed to creating and maintaining a fair and inclusive working environment in compliance with the laws applicable in all countries in which it operates.

This commitment is supported by our diversity, inclusion, and belonging policy.

All employees are responsible for fostering an open, inclusive, and respectful working environment.

By embracing different perspectives and demonstrating an inclusive approach, we make better decisions and create new opportunities.

Treating Each Other with Respect

At Alcas, we aim to ensure that everyone feels included, engaged, and supported in a way that enables them to perform at their best. This approach is shaped by our core values of care, courage, and collaboration.

Every individual has the right to be treated with dignity and respect in the workplace, and this right is safeguarded through a supportive working environment based on cooperation and mutual trust.

Workplace Free from Harassment

Alcas maintains zero tolerance for all forms of harassment and bullying in the workplace.

We all have the right to work in an environment free from threats and harassment, where we feel safe and comfortable.

Workplace harassment may manifest itself in different ways from person to person and may take physical, verbal, sexual, or other forms.

Alcas does not tolerate any form of discrimination or harassment, including but not limited to discrimination based on gender, gender identity, race, colour, religion, political opinion, union membership, ethnic origin, disability, age, sexual orientation, marital status, or any other grounds prohibited under applicable legislation.

In addition, all forms of physical punishment are strictly prohibited.

Equality for Everyone

Alcas recognizes that individuals may have different opportunities and/or disadvantages and that everyone has different starting points.

We aim to ensure that all employees have equal opportunities to contribute and succeed, taking into account their individual starting conditions.

Alcas is committed to carrying out active, goal-oriented, and systematic efforts to promote equality and prevent discrimination.

Every individual is valuable and should have equal opportunity to have their voice heard.

Modern Slavery and Ethical Recruitment

Alcas is strictly opposed to modern slavery, slavery, human trafficking, forced labour, debt bondage, and all forms of compulsory labour practices.

Recruitment processes are conducted in accordance with ethical recruitment principles. Employees are not required to pay unlawful fees, deposits, or surrender identity documents as a condition of employment.

Women's Rights, Minorities, and Indigenous Peoples' Rights

Alcas is committed to respecting women's rights, supporting the equal participation of women in working life, and preventing all forms of gender-based discrimination.

Alcas respects the rights of minorities and indigenous peoples and supports the protection of cultural identity, traditional ways of life, and fundamental human rights.

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2.3 Occupational Health, Safety, Security, and Environment

Safety First

At Alcas, we place human life above everything else and never compromise on occupational health and safety. We are committed to providing a healthy and safe working environment for our employees, contractors, and visitors, and to promoting health and well-being in the workplace.

Safety Is Not Accidental, It Is a Conscious Choice

Alcas believes in excellence in Occupational Health and Safety (OHS). This approach is achieved through the visible leadership of all our managers, the consistent implementation of the Alcas OHS management system, a strong risk-based approach, continuous employee engagement, and a sense of responsibility toward the environment.

Alcas complies with all applicable OHS legislation and internal OHS requirements and aims to go beyond them where possible.

Zero Accident Approach

At Alcas, we believe that all occupational accidents, work-related illnesses, and environmental incidents are preventable.

Security and Protection of Assets

Alcas is committed to protecting its employees, business activities, and assets against harm that may arise from intentional acts.

This approach is supported by a culture based on strong employee engagement, continuous learning, and continuous improvement.

Environmental Responsibility

Alcas actively manages its impact on nature and systematically identifies risks related to biodiversity loss and environmental degradation.

Where necessary, Alcas implements effective environmental management practices within its operations and takes the necessary actions when environmental incidents occur.

Land, Forest, and Water Rights

Alcas is committed to responsibly managing the impacts of its activities on land, forests, and water resources. The Company opposes forced evictions and respects the living environments and natural resource rights of local communities.

Sustainability and Continuous Improvement

Alcas is committed to promoting innovation and carrying out continuous improvement activities.

Our objective is to eliminate or minimize the environmental impact of our activities and products.

Our Occupational Health, Safety, and Environmental Responsibilities

It is the responsibility of all of us to comply with occupational health, safety, and environmental rules and to demonstrate commitment to HSE excellence.

All employees are expected to perform their duties safely and securely in accordance with applicable requirements.

Every employee has the right to refuse work in situations that may cause harm.

At the same time, employees have the responsibility to report any unsafe conditions and behaviours they observe to persons at risk, management, the OHS department, or Human Resources.

In addition, you must immediately report any occupational accident or incident that may result in injury or damage.

All employees at Alcas are responsible for complying with OHS policies and procedures and ensuring their implementation.

2.4 Quality

As Alcas Metal Sanayi A.Ş., we adopt operational excellence at every stage of our activities and are committed to providing our customers with sustainable, reliable, and high-quality products.

Our understanding of quality is based on ensuring stability in production processes, maintaining high precision in metallurgical processes, ensuring continuity and consistency in products, paying attention to detail in all operations, producing with high workmanship quality, adopting a culture of continuous development and improvement, ensuring timely and complete delivery, and providing measurable and sustainable value to our customers.

Accordingly, Alcas commits to:

- Fully meeting customer expectations and contractual requirements,
- Complying with national and international standards,
- Continuously reviewing and improving its Quality Management System,
- Effectively managing risks and opportunities,
- Promoting quality awareness through the participation of its employees.

3.1 Anti-Corruption and Prevention of Bribery

Alcas maintains zero tolerance for bribery and corruption in any form, including facilitation payments and commissions, whether in transactions involving public officials or private sector representatives.

We are committed to full compliance with all applicable anti-corruption and anti-bribery laws and regulations.

During activities carried out on behalf of Alcas, you may not, directly or indirectly, offer, give, request, or accept any bribe or improper advantage on your own behalf or on behalf of another person.

An improper advantage means anything of value that does not have a legitimate business purpose and is provided with the intention of influencing another party to act or refrain from acting in a certain manner while performing their duties.

Such advantages may include cash or cash equivalents, gifts, hospitality and entertainment, privileges, business or employment opportunities, or any other item of economic value.

Failure to comply with these rules shall be considered a serious violation and disciplinary offence.

Furthermore, Alcas protects employees who refuse to participate in any activity that may be regarded as bribery, corruption, or a facilitation payment, and does not permit any form of retaliation against such employees.

3.2 Facilitation Payments and Extorted Payments

Facilitation payments, also referred to as “speed” or “grease” payments, are payments made to secure the performance of a public service or routine official action to which one is already legally entitled.

Such payments are prohibited and may not be initiated or encouraged in any manner, directly or indirectly on behalf of Alcas, including through business partners.

By contrast, extorted payments are payments made in response to real and immediate threats to an employee’s life, safety, or health, or to risks concerning the integrity of Company facilities.

Such payments are not considered bribes; however, they should only be made in exceptional circumstances and must be carefully evaluated, even if the amount involved is small.

If you are subjected to a demand for an extorted payment, you must immediately report the situation to your manager.

This notification is required in order to ensure that the situation is properly managed and that the transaction is appropriately recorded.

3.3 Working with Business Partners

Alcas's success depends on cooperation with suppliers, customers, contractors, agents, distributors, consultants, joint venture partners, and other business partners.

All business partners are expected to comply with all applicable laws and regulations. Suppliers and sub-suppliers are expected to comply with the principles set forth in the Alcas Supplier Code of Conduct.

These rules establish minimum standards particularly in the following areas: business ethics and anti-corruption, human rights, working conditions, environmental and climate impacts.

Failure to comply with these requirements may result in the termination of the business relationship.

Integrity and Compliance Reviews

Alcas conducts risk-based integrity reviews in order to ensure that the reputation, background, and ethical standards of business partners are aligned with its own standards.

Depending on the level of risk, such reviews may also include analyses of company structures and ultimate beneficial ownership.

Working with Intermediaries

Special care must be taken when entering into agreements with intermediary business partners acting on behalf of Alcas (for example: agents, distributors, dealers).

This is because Alcas may be held responsible for the actions of such intermediaries.

Therefore, intermediaries must be closely monitored and supervised throughout their activities.

All intermediary business partners must comply with applicable laws and regulations and adhere to the Alcas Code of Conduct.

In addition, it is our responsibility to inform intermediary business partners about the Alcas Code of Conduct and its requirements.

3.4 Gifts and Hospitality

When giving or accepting gifts in a business environment, we must always exercise sound judgment, act with moderation, and use Alcas's reputation and integrity as our ultimate guiding principles.

We do not offer or accept gifts, hospitality, expense coverage, or other business courtesies that could influence business decisions, impair our independence or impartiality, or create the appearance of such influence.

Our objective under all circumstances is to make decisions objectively, independently, and in the best interests of Alcas.

Gifts and hospitality offered as part of business courtesies may only be given or accepted if they are reasonable in terms of value and frequency and appropriate with respect to time and place.

Practices relating to gifts and hospitality may vary across cultures; however, all gifts and hospitality given or received must comply with applicable laws, the compliance rules applicable to the recipient, and must also be acceptable under local business practices.

The ability to offer gifts or hospitality to public officials is restricted both by Alcas policies and by legal regulations.

Since the definition of a public official may be interpreted broadly to include employees of state-owned enterprises and public institutions, the utmost caution must be exercised in relation to business courtesies involving public officials.

In many countries, gifts and hospitality provided to public officials are legally restricted. Public institutions have rules prohibiting their representatives from accepting gifts or hospitality.

Therefore, guidance must always be obtained from your manager regarding any gift or hospitality involving public officials.

In addition, it is the responsibility of employees to understand and comply with our gifts and hospitality policy. This policy provides additional guidance on how these rules should be applied within your area of responsibility.

In case of any uncertainty, please consult your manager or the Compliance Department.

3.5 Donations, Sponsorships, and Community Investments

Alcas is committed to creating sustainable value and aims to contribute positively to the economic and social development of local communities through its activities, business relationships, community investments, donations, and sponsorships.

Donations are generally one-time or periodic contributions made in response to the needs and requests of charitable organizations and community groups, employee requests, or external circumstances such as disasters and emergency relief efforts.

Community investments, on the other hand, are made with the objective of contributing to the long-term socio-economic development of local communities.

The purpose of these investments is to develop local capacity, support economic development, strengthen sustainable livelihoods, promote human rights and transparency, and contribute to the fight against corruption.

Sponsorships are activities carried out in cooperation with charitable organizations and community-based organizations that directly support the Company's success and aim to promote its corporate identity, brand value, and policies.

Risk and Compliance

A significant risk associated with donations, sponsorships, and community investments is that such activities may be perceived as bribery or used for bribery purposes.

Such activities are unlawful if they are used to conceal bribery directed toward individuals, including public officials.

Implementation Principles

Donations, sponsorships, and community investments must be based on a legitimate business rationale and aim to provide benefits both to society and to Alcas.

In addition, these activities must be conducted in a transparent and open manner, be based on objective criteria, and be properly recorded, documented, and reported. They must comply with the relevant procedures of Alcas.

Selection of Business Partners

The same principles applied to other commercial business partners also apply to business partners selected within the scope of community investments, donations, and sponsorships.

In this context, the reputation and integrity of new or lesser-known organizations and their key personnel must be evaluated through Alcas's risk-based integrity review processes.

3.6 Political Donations and Activities

No financial or other type of donation shall be made on behalf of Alcas to political parties, party representatives, or individuals running for public office.

This does not prevent Alcas from expressing its views through industry associations in line with Company interests or employees from participating individually in political activities.

However, such activities must be carried out in an individual capacity and not on behalf of the Company.

3.7 Fair Competition

At Alcas, we believe in free, fair, and open competition.

Our policy is to compete vigorously and effectively, while always doing so in full compliance with applicable laws and business ethics.

Accordingly, we comply with all competition laws and related regulations. We conduct our relationships with competitors in accordance with the principles of honesty, fairness, and integrity.

We aim to achieve our competitive advantage through innovation, research and development, and our engineering capabilities, and we strictly reject gaining advantage through unethical or unlawful business practices.

We do not enter into anti-competitive agreements with competitors, such as price fixing, market sharing or segmentation, or bid rigging.

We do not share commercially sensitive information with competitors.

Particular caution must be exercised during conferences, trade fairs, industry association meetings, and joint ventures involving competitors.

We do not impose unlawful restrictions on our customers or suppliers.

We do not abuse any market power we may possess.

From a competition law perspective, you must seek guidance from the independent Legal Department regarding any matter that may create risks for Alcas, yourself, or employees reporting to you.

While obtaining and understanding information about competitors is important for every business and constitutes a fundamental element of a properly functioning competitive environment, all information relating to competitors must be collected and used in accordance with applicable laws and good business practices.

As Alcas, we obtain competitive intelligence only from legitimate and lawful sources and never resort to unlawful or unethical methods.

When collecting data relating to competitors, the source of the information obtained must always be documented.

3.8 Data Privacy

Alcas is committed to respecting the right to privacy and acts in compliance with applicable regulations regarding the processing and protection of personal data.

In order to ensure the consistent and standardized implementation of data privacy principles throughout the Company, Alcas has adopted data protection policies and rules.

All employees are obligated to comply with these principles.

This commitment and these data protection principles cover all processes relating to how we collect, use, store, and protect information concerning employees, customers, business partners, visitors, and other relevant individuals.

3.9 Accurate and Complete Data, Records, Reporting, and Accounting

Alcas is committed to transparency and accuracy in all of its activities while respecting confidentiality and other obligations.

Alcas is obligated to provide complete, fair, accurate, and understandable information in its periodic financial reports, documents submitted to regulatory authorities, and other public disclosures.

In this context, employees are required to exercise the highest standard of care when preparing relevant documents and to pay particular attention to the following matters:

Fundamental Principles

All accounting records must be maintained in accordance with applicable laws. They must not contain false, misleading, or artificial entries.

In addition, such records must accurately and completely reflect and document all financial elements and all transactions carried out, including assets, liabilities, revenues, and expenses.

Integrity of Records

No transaction may knowingly be incorrectly classified into accounts, departments, or accounting periods.

No unrecorded assets or liabilities may be maintained unless legally permitted.

Sustainability Reporting

Compliance must be ensured with applicable legal regulations, including ESG (Environmental, Social, and Governance) reporting requirements, as well as Alcas's internal sustainability reporting standards.

Audit Transparency

No information may be concealed from internal auditors, external auditors, or management.

3.10 Trade Restrictions (Sanctions)

Alcas is committed to complying with all applicable national and international trade restrictions, including economic sanctions.

Trade restrictions (sanctions, embargoes, and trade controls) cover the export or import of certain goods, technologies, software, and services and/or commercial activities with certain countries, individuals, entities, or sectors.

In particular, certain regulations may prohibit Alcas from conducting business with:

- persons or entities connected with certain countries or regimes,
- persons involved in human rights violations,
- persons associated with international drug trafficking,
- persons linked to terrorist activities,
- persons associated with the proliferation of weapons of mass destruction,
- or persons involved in other criminal activities.

Within this scope, Alcas screens all parties with whom it conducts business against applicable sanctions lists.

3.11 Prevention of Money Laundering and Combating the Financing of Terrorism

Money laundering is the process of introducing and integrating proceeds derived from criminal activities into the legal economy in order to conceal their unlawful origin.

The financing of terrorism refers to the transfer of funds obtained from legal or illegal sources to individual terrorists, terrorist organizations, or terrorist activities.

Alcas is committed to taking all reasonable measures necessary to prevent and detect unlawful payments of any kind and to prevent the Company from being used for money laundering or the financing of terrorism.

If you have any suspicions or questions regarding these matters, you are required to contact your manager.

3.12 Intellectual Property

Intellectual property is the result of our intellectual activities and constitutes a valuable asset for Alcas.

Intellectual property rights are protected by local and national legislation as well as international agreements and include:

- patents,
- trademarks,
- copyrights,
- design rights,
- trade secrets.

As Alcas, we are obligated to protect our own intellectual property rights.

At the same time, we respect the intellectual property rights of third parties. It is our fundamental policy not to infringe upon the intellectual property rights of others.

3.13 External Communication

Alcas's reputation in national and international markets largely depends on our ability to communicate consistently and professionally with external stakeholders, including the media.

For this reason, Alcas adopts the principle of honesty in its relations with external stakeholders and the public and is committed to responding to incoming requests in a transparent, accurate, and timely manner.

Counterfeit Parts

Alcas is committed to preventing counterfeit, fraudulent, or unverified products, parts, and materials from entering the supply chain.

All products, raw materials, and components are procured only from approved suppliers and are controlled in accordance with the principle of traceability.

4.1 Conflict of Interest

A conflict of interest arises when a personal interest may affect your ability to make objective decisions or may prevent you from acting in the best interests of Alcas.

You must not participate in or attempt to influence any decision where a real or perceived conflict of interest may arise.

Such situations may occur when you or a person closely connected to you may obtain an economic or other personal benefit from the outcome of a decision.

Personal Investments and Affiliations

You must avoid holding direct or indirect ownership interests in another company in a manner that may affect, or appear to affect, your duties at Alcas.

If such a situation exists, you must immediately inform your manager.

Responsibility and Principles of Conduct

All employees are expected to exercise sound judgment and avoid situations that may create, or appear to create, a conflict of interest.

Alcas relies on its employees to maintain the highest standards of integrity.

Situations Requiring Approval

In situations where you may act in favour of a competitor, customer, or supplier, and where such activity may harm the interests of Alcas (for example, serving as a board member of the relevant company), you must consult with and obtain approval from your manager before engaging in such activity.

Reporting Obligation

If you believe that a conflict of interest or a potential conflict of interest exists, you are required to notify your manager, Human Resources, or send an e-mail to ethics@alcas.com.tr.

Conflicts of interest are manageable situations; what is important is to be transparent and openly disclose the situation. This enables the necessary measures to be taken and the matter to be resolved appropriately.

4.2 Use of Company Assets and Resources

It is the responsibility of Alcas employees and all individuals representing the Company to protect the assets, property, and records of Alcas, as well as those of its customers, suppliers, and other business partners.

Types of Assets

Tangible assets include:

- Physical facilities and equipment,
- Computer systems, PCs, and mobile devices,
- Files and documents,
- Inventory and consumable materials,
- Real estate.

Intangible assets are non-physical elements that carry value, including:

- Patents,
- Trademarks,
- Copyrights,
- Other intellectual property rights,
- Trade secrets,
- Know-how,
- Confidential information,
- Brand value and reputation.

Responsibility for Use and Protection

It is everyone's responsibility to use Alcas assets with due care.

All employees are obligated to ensure that assets are properly managed and protected and to exercise the necessary care to prevent theft, misuse, or waste.

Prohibition of Unauthorized Use

Materials, financial resources, and other assets belonging to Alcas may not be used for purposes unrelated to Company activities without appropriate authorized approval.

Likewise, the unauthorized removal, lending, or disposal of Company assets is prohibited.

Use of Information and Systems

Work-related information must only be stored on systems, computers, and mobile devices approved or managed by Alcas.

Computers and mobile devices provided by Alcas are the property of Alcas and may only be used by employees or authorized contractors.

Personal Use

Limited personal use of mobile devices is acceptable provided that such use complies with applicable Company policies, information security rules, Human Resources practices, Alcas internal regulations, and applicable laws.

4.3 Confidentiality

As Alcas, we are committed to protecting all trade secrets and other confidential information in our possession and to not misusing such information.

This obligation also applies to information obtained from our business partners. Such information must be protected with the same level of care as Alcas's own information and may only be used for the purposes for which it was provided.

Confidential information may include intellectual property, personal data, commercial terms, technical or contractual information, and other information protected under applicable legislation.

Continuity of Confidentiality Obligations

Your confidentiality obligations continue even after the termination of your employment or contractual relationship.

In addition, you must not share confidential information belonging to your former employer with Alcas.

Definition of Confidential Information

All information obtained while working within Alcas, other than general business knowledge and professional experience, shall be considered confidential information and must be protected accordingly.

Responsibility

Protecting confidential information is the responsibility of every employee.

In this context, confidential information must not be shared with unauthorized persons and must be properly stored and protected.

Use confidential information only where authorized and solely for legitimate business purposes.

Do not share confidential information belonging to Alcas or our business partners with friends, family members, or former Alcas employees.

Do not discuss or share confidential information in public areas where it may be overheard by third parties.

Do not work with documents containing confidential information (whether printed or electronic) in public areas or on unsecured networks where they may be viewed by third parties.

Where information sharing with third parties is required, ensure that appropriate confidentiality agreements are in place.

Store confidential information only in environments protected by encryption and access controls, and restrict access solely to persons with a legitimate business need.

Where appropriate, label documents as “Confidential.”

4.4 Insider Trading

Inside information is information obtained through your position at Alcas or through other means that is non-public, specific in nature, and likely to affect the price of the Company’s securities or other financial instruments if made public.

Within this scope, you must not trade in the securities of Alcas or other publicly traded companies, or provide recommendations to others to do so, based on inside information. This rule applies regardless of whether or not you are formally registered as an “insider.”

Inside information must be treated as confidential and protected with the utmost care in order to prevent unauthorized access.

Obligation to Seek Guidance

In the following situations, you must contact the Administrative Affairs Manager regarding questions related to inside information that may affect securities belonging to Alcas.

For questions relating to obligations concerning financial instruments or commodity markets outside Alcas, you must contact the Finance Manager.

4.5 Information Security

At Alcas, information security is based both on the protection of technical systems and on all users complying with fundamental security rules:

- **Protect your digital identity:**
Ensure that your passwords are unique and secure. Your identity credentials are personal and must only be used for business purposes.
- **Protect Alcas data:**
Use only software and services approved by Alcas. Comply with Company guidelines relating to information management.
- **Ensure network security:**
Connect only through trusted networks.
- **Protect your user devices:**
Do not share your devices with others and do not leave them unattended without screen lock protection.
- **Immediately report any information security breach or suspected breach that you become aware of.**

4.6 Substance Use and Other Personal Conduct

Alcas provides a work environment free from the influence of drugs and alcohol. Therefore, while working on behalf of Alcas, you may not be under the influence of any intoxicating substance, including alcohol.

Reputation and Conduct

Alcas employees must not use or promote intoxicating substances in a manner that may damage the reputation of Alcas or its business partners, whether relating to themselves or others.

Unethical Activities

Alcas strictly prohibits the purchase of sexual services during business travel or assignments, even where permitted under local legislation.

In addition, employees must not visit venues or participate in activities that could negatively reflect on Alcas.