

ANNEX-1



ŞİŞECAM

**ŞİŞECAM GROUP
CODE OF CONDUCT**

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ŞİŞECAM GROUP CODE OF CONDUCT

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ABOUT THE CODE

We aim to add value to all our employees and stakeholders, shape the future through the products and services making life easier, and share the prosperity we created, on a national and global scale, along with a responsible approach toward people, nature, and laws in accordance with our sustainable growth strategies adopted by the Şişecam Group.

We merge our performance with our responsible, ethical, visionary, and well-set professionalism and believe that our well-deserved success that we are proud of will be sustainable in the light of these rules of conduct. The "*Şişecam Group Code of Business Ethics*", that we have developed for the dissemination of this understanding in our Group and to pass it on to our future generations, serves as a guide for our employees which sets out the responsibilities towards their internal and external stakeholders. Regardless of their locations, all Şişecam employees are responsible as a primary duty, to demonstrate the necessary effort and leadership in complying with the values in this guide. Additionally, there are various policies, regulations and procedures that are specific to the positions held or to the Şişecam companies, that must also be adhered to. We also expect our suppliers and business partners to adopt similar standards and applications, and to comply with the "*Şişecam Group Supplier Code of Conduct*".

We exercise due care to present our products and services within the framework of the Legislation, company policies and commitments and to fulfill our responsibilities.

In all geographies where our Group operates, our employees and stakeholders govern their work by adopting the Şişecam Group Code of Conduct and act accordingly.

We expect our employees and business partners, to fully implement these principles and rules, and obligations in laws and regulations while doing their work, encourage their colleagues to implement the same, and to report any witnessed or suspected breach of the code of conduct through the relevant channels.

Our goal is to provide a more peaceful, healthier, and safe work environment to all our stakeholders through continuous improvement and leave a livable world behind for the future generations by raising consciousness toward environment and community in all our activities.



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DEFINITIONS

Audit Committee: the Audit Committee formed under the Company's Board of Directors,

Ethics Hotline: <https://ethicshotline.sisecam.com>

Turkey/0800 621 2393, Austria/0800 017855, Bosnia & Herzegovina/080 083 067, Bulgaria/0800 46 269 China/400 120 0275, Egypt/0800 006 0316, Georgia/0800 10 02 50, Germany/0800 180 0655, Hungary/80 088 538, India/000 800 919 0261, Italy/800 828 488, Netherlands/0800 022 2904, Romania/0800 360 147, Russia/8 800 301 85 34, Slovakia/0800 601 478, Spain/900 876 290, Ukraine/0800 801 480, USA/1 800 508 1753

Ethics Board: the Board reporting to the Corporate Governance Committee,

CEO: the CEO of Şişecam,

Legislation: any law, regulation, communiqué, circular, decision or any other rules, applicable to Şişecam and its Subsidiaries, issued by the country where the relevant company is established, by a supranational or international institution or by any means, by a third country, which may have a binding effect on Şişecam or its Subsidiaries,

Company or Şişecam: Türkiye Şişe ve Cam Fabrikaları A.Ş.,

Subsidiary: the affiliated companies operating under the Group and controlled by Şişecam,

Supplier: real persons or legal entities providing goods, services and/or consultancy,

Group Employee: all monthly and hourly paid employees of the Group companies,

Group: Türkiye Şişe ve Cam Fabrikaları A.Ş. and all Subsidiaries,

Board of Directors: the Şişecam Board of Directors.



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OUR FUNDAMENTAL PRINCIPLES

The Şişecam Group conducts all professional activities with the following fundamental principles. The Group acts based on these fundamental principles with its customers, suppliers, shareholders, and other stakeholders.

1. Integrity

Conducts all activities based on the integrity principle. Gives utmost importance on establishing decent and reliable relations with its customers, suppliers, shareholders, and other stakeholders and does not get involved in deceptive or unrealistic actions or statements.

2. Transparency

Is transparent and open in its relations with customers, suppliers, shareholders, and stakeholders. Provides accurate and comprehensible information in all its activities in a timely and complete manner by considering the confidentiality criterion.

3. Impartiality

To enable a fair and reliable working environment which supports policies respecting human rights, offers its employees equal opportunities at all levels, regardless of language, religion, sect, race, nationality, gender, sexual orientation, social or personal status, health status, marital status, personal belief, dress code, disability status, age or other characteristics protected by local legislation, does not discriminate among customers, suppliers, shareholders, and other stakeholders. Group employees treat everybody fairly and equally and avoid prejudiced attitudes.

4. Confidentiality

Keeps confidential the information related to customers, employees, and other third parties accessed during its professional activities. Takes all necessary measures to obtain and store such information in accordance with the applicable procedures and that such information is accessed only by authorized persons. Other than those that are publicly available, such information cannot be disclosed or used by the stakeholders without the prior written permission of the Group.

5. Respect for the Employees

The Şişecam Group offers a fair, safe, and productive work environment to its employees and acts in accordance with universal human rights. Respects and values the opinions, personal values, and beliefs of all stakeholders and colleagues.

6. Sustainability

Gives importance to the protection of biological diversity, is aware of the risks in this area, and demonstrates great effort to minimize the effects of its production processes and products on the environment.



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7. Compliance with Laws and Legislation

Acts in compliance with the applicable laws and legislation, executes activities and takes necessary measures for compliance. Expects all stakeholders to comply with the laws, legislation, regulations, and contracts.

8. Social Responsibility

Respects the values of the communities in which it operates, be wary of their interests, carries out activities to ensure responsibilities towards the communities are not deterred, and takes the necessary measures.

9. Zero Tolerance to Bribery and Corruption

Şişecam has adopted the principle to comply with the laws and universal legal principles, ethical and occupational standards that govern bribery and corruption, in all countries where it operates and represented. In this regard, Şişecam acts with "zero tolerance" approach towards bribery and corruption.

1. ŞİŞECAM GROUP EMPLOYEE RELATIONS

The Şişecam Group is committed to provide a fair, safe, and productive work environment to its employees and to act in accordance with the universal human rights. The Group believes that the provision of such a working environment to its employees is one of the most fundamental factors affecting the Group's success.

Accordingly,

- 1.1. Equal opportunities are offered based on the job specifications, to all employees and employee candidates at all levels, regardless of language, religion, sect, race, nationality, gender, sexual orientation, social or personal status, health status, marital status, personal belief, attire, disability, age, or other characteristics protected by local legislation.
- 1.2. The primary assessment criterion followed in the appointment, promotion, or recruitment processes is the professional and managerial competence of the person to perform the related job. Factors unrelated to the job are not taken into account while hiring a candidate.
- 1.3. The Şişecam Group, continuously cultivates and improves its working environment to offer a working environment that is inclusive and supports diversity and applies its "Şişecam Group Diversity and Inclusion Guide" to spread this approach.
- 1.4. The Group respects the exercising of the related legal rights of the employees for freedom of association and collective bargaining. Carries out constructive relations with trade unions or other representatives. Complies with the standards of ILO on collective bargaining and freedom of association.
- 1.5. Builds an employee profile in conformity with the age limits set forth in the Labor Law and the legislation, does not allow child labor. Neither we nor our business partners accept acts against human rights, such as forced or compulsory labor. Our employees respect fundamental human rights. Compliance with the ILO standards on non-discrimination, child labor and forced labor is ensured.
- 1.6. The behaviors of physical, sexual, and psychological abuse and violence are never allowed. All measures to protect the personal rights of our employees are taken. In case of any attitudes and behaviors to the contrary, regardless of the position or identity of the



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- perpetrator or the violator within the Şişecam Group, the Şişecam Group shall impose relevant disciplinary penalties and under no circumstances will the situation be tolerated.
- 1.7. For employees who are exposed to domestic violence, communication channels to ask for support are available. Psychological support is provided through the employee support program.
 - 1.8. Employees who are exposed to any behavior contrary to the code conduct or employees and stakeholders who witness or have the opinion or suspicion that any employee or stakeholder is exposed to a breach of the code of conduct, have the right as well as the responsibility to report to the Ethics Board through the most appropriate method. On receipt of such reports, The Şişecam Group commits to conduct an independent, objective and fair examination, irrespective of the positions of the person or persons within the Şişecam Group who are claimed to be in breach of the Code of Conduct and to impose the most appropriate disciplinary penalty if the authorized committees are in the opinion that the alleged breach has occurred, and to support the victim to pursue his/her rights if the breach also has criminal or civil consequences.
 - 1.9. To enable compliance with the Code of Conduct, the Şişecam Group is aware that it is essential for the victims or their witnesses to report any breaches without any fear or concern, and therefore, commits, under no circumstances, that the complainant who reports any breach of the Code of Conduct to the Ethics Board, to be confronted with any penalties, discrimination, or negative performance assessment due to such reporting.

2. ŞİŞECAM GROUP STAKEHOLDER RELATIONS

The Şişecam Group cares about establishing accurate, consistent, and reliable business relationships with its stakeholders, and expects its stakeholders to comply with the Code of Conduct and the legislation. Assesses all existing and potential stakeholders in the context of equal and fair rules. Strictly adheres to the agreements and protocols it engages in, does not demand out of business penalties, and does not make commitments that it cannot fulfill. Confidential information belonging to its stakeholders are disposed of following the relative processes, any information that is achieved outside of official routes are not taken into account. Information achieved during the course of the business are not disclosed to people other than those involved in the performance of the job, and rights on confidentiality are respected.

2.1. RELATIONS WITH THE CUSTOMERS

- 2.1.1. Customer satisfaction-oriented approach is exhibited in the activities, quality products and services are offered, and development of innovative products is encouraged. Customers are informed about topics like rights and obligations regarding the products and services offered and the potential risks involved, and commitments are fulfilled.
- 2.1.2. Complaints and objections received from the customers are assessed, and necessary inspections and analysis are conducted. Customer issues are addressed responsibly, and utmost care is taken to establish a trust-based relationship by adopting a solution-oriented approach.
- 2.1.3. Şişecam employees always take care to establish relationships with customers and customer representatives in a professional manner and within limits, and do not offer to



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establish relations outside these limits or accept offers in this direction. Group employees, being aware that they represent Şişecam in their relations with their customers, are obliged to act in accordance with the Code of Conduct and the Şişecam values and principles in general.

2.2. RELATIONS WITH SUPPLIERS AND BUSINESS PARTNERS

- 2.2.1. Şişecam is aware that its suppliers and business partners have a huge impact on its products and services; and adopts honest, respectful, and fair conduct towards its stakeholders. Utmost attention is paid to ensuring compliance with international and local legislation in its stakeholder relations.
- 2.2.2. An impartial approach is displayed in the selection of business partners and suppliers, elements of benefit relations such as conflicts of interest are not accepted, and their occurrence is not allowed.
- 2.2.3. Attitudes and conduct such as favoritism and benefiting are not allowed in tenders and procurement.
- 2.2.4. The Şişecam Group cannot demand sub-contractors or any persons or institutions that it engages in a business relation, to perform other than the obligations defined in their job descriptions.
- 2.2.5. Suppliers are expected to act in conformity with the "*Şişecam Group Supplier Code of Conduct*" and to contact the Group in case of any breaches.

2.3. COMPETITORS AND COMPETITION RELATIONS

- 2.3.1. The Group encourages competing with the competitors in fair conditions, and in the context of legal and business ethics limits, unfair competition or acts in violation with competition law is avoided and consumer interest is taken into account in the activities. The integrity principle is not compromised in competition.
- 2.3.2. In the markets where advantageous positions have been achieved, creating market entry-barriers for potential players in the market is avoided; and on the contrary, in those markets we support reduction of prices to the benefit of the consumers within the scope of the applicable competition laws and to offer innovative products and services to customers.
- 2.3.3. Information about competitors obtained through non-official channels and confidential information are not retained and shared with others.

2.4. RELATIONS WITH GOVERNMENT BODIES AND PUBLIC INSTITUTIONS

- 2.4.1. While conducting its activities, the Şişecam Group maintains an equal distance with government agencies, nongovernmental organizations, and political parties. Applicable



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laws, legislation and regulations are adhered to, and any form of benefit relations shall not be established with public officers, political persons and representatives.

- 2.4.2. For the information required to be publicly disclosed, the disclosure is done with utmost care in an accurate, consistent, and timely manner.
- 2.4.3. Political donations or support are not allowed on behalf of the company, to political parties or to support candidates.
- 2.4.4. Gifts or hospitality cannot be provided to public officials or to politically influential persons in the countries where Şişecam operates, to obtain or maintain a business.
- 2.4.5. In recruitment decisions, public figures and public officials cannot be inappropriately prioritized without being based on competencies,
- 2.4.6. Facilitation payments cannot be made or offered,

2.5. MEDIA COMMUNICATIONS

- 2.5.1. An impartial attitude is shown toward and an equal distance is maintained with all media institutions.
- 2.5.2. All content studies such as statements, opinion, news reporting or interview requests by media are managed by the unit responsible for corporate communication activities of Şişecam. The statements related to the Group are conducted by spokespersons authorized by the Group. No public disclosure is made by anyone other than the authorized persons. Discourses contradictory to the corporate culture or those that could harm the Group's reputation shall not be made; discourses that include discrimination, hatred, and offense shall not be used.
- 2.5.3. The Chairman of the Board of Directors is assigned the duty to provide statements or other opinion on behalf of the company, as well as to establish communication and share information that are required by the fundamental strategies. The Chairman may delegate the task in whole or in part, depending on the subject and the nature of the job, to persons deemed appropriate by the Chairman.
- 2.5.4. The Şişecam Group does not make any misleading advertising that does not reflect the truth; exhibits respectful attitude to its competitors and the community and avoids making discourses that could harm their reputation. The Group does not permit advertisements with inappropriate content that is contrary to the general ethics rules and could lead to discrimination, violence, and abuse.

2.6. INVESTOR RELATIONS

- 2.6.1. Corroborating the goal of creating value for its investors, the Group protects the benefits of the investors and acts in the context of financial discipline and accountability. Manages the resources and assets of the company being conscious of efficiency and saving, creates maximum value in its activities, and executes the distribution of the acquired rights in accordance with the laws and legislation.
- 2.6.2. Ensures that the information required to be publicly disclosed to the investors and the public, is complete and accurate and disclosed timely through the right channels.



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3. ASSET AND INFORMATION MANAGEMENT

3.1. USE OF RESOURCES (System, Service, and Equipment)

- 3.1.1.** Any intellectual and industrial, tangible or intangible assets that are provided in relation to the business or created during the course of the business fall under the scope of the Group resources within the framework of the "Intellectual and Industrial Property Rights Legislation" and other relevant legal regulations.
- 3.1.2.** Utmost care is taken to ensure the Group's resources are used fairly, effectively, efficiently, on necessity basis and protected to the maximum extent possible, and their use for personal benefit is not tolerated.
- 3.1.3.** Working hours within the time planning are determined by taking into account the work and personal life balance. Employees are aware of their duties and responsibilities for their team members and avoid attitudes and behaviors that distort the work order and adversely impact their workflow.
- 3.1.4.** Where possible, economic and environmentally friendly meeting methods such as video and teleconferencing, etc., are preferred rather than travelling for meetings.

3.2. INTELLECTUAL PROPERTY RIGHTS

- 3.2.1** Confidential information regarding intellectual property, industrial-commercial rights (logo, brand, image, corporate identity, etc.) belonging to the Group, that shall not be disclosed, are not shared with third parties. Where information sharing is necessary, it is done provided that necessary measures are taken in accordance with the laws and regulations to protect the Group's rights.
- 3.2.2** Unauthorized use of intellectual property, industrial-commercial rights outside of the Group (such as patents, commercial secrets) is avoided.

3.3. INFORMATION MANAGEMENT

3.3.1 Record Keeping and Accuracy

- 3.3.1.1** For the reputation, reliability, and sustainability of the Group, it is ensured that all records are recorded, reported, and maintained in the correct content and time, in accordance with national and international legislation and regulations. It is conducted with the awareness of the responsibilities.
- 3.3.1.2** Besides, third-party stakeholders (such as suppliers/business partners, customers, regulatory bodies, and institutions, etc.) are treated transparently; in case it is requested or required under regulations, any information that is not deemed to be confidential is shared in full, accurately, timely and clearly.

3.3.1.3 Information restored in the Company contain valuable information, and must be reported in compliance with regulations, procedures, and policies.

3.3.2 Confidentiality and Security

3.3.2.1 Şişecam Group expects its stakeholders to respect all information, including intellectual property rights, trade secrets, sensitive and confidential information belonging to its employees, customers, suppliers and all other stakeholders, and to take the necessary security measures to protect such information, if they have access to such confidential information. Such information, other than publicly available information, cannot be disclosed or used by the stakeholders without the prior written permission of the Group.

3.3.2.2 When an information request arrives from outside the Group and involves confidential information, the request shall be submitted for the approval by the CEO and no information shall be shared without the CEO's approval. If required, following such approval, , the "*Şişecam Group Confidentiality Agreement*" must be signed before sharing the information.

3.3.2.3 Unfair profits from capital markets by using the information that is not disclosed to third parties and obtained within the Group; and acting as an intermediary to earn unfair profits by sharing such information with third parties, is not allowed.

3.3.2.4 In the events within or outside the Group, where information is shared, the information must include data that is disclosed to the public and any share of confidential information is not allowed. This principle also applies to technical visits, training, presentations, cooperation, comparative studies, and event contents.

3.3.2.5 To ensure the security of the Group's information, the "*Şişecam Group Information Security Management Policy*" must be followed.

3.3.3 Collaboration with Supervisory, Audit, and Management Units

3.3.3.1 Supervisory, Audit and Management units are always collaborated. If information is requested, such information is provided in the shortest time possible and in full.

3.3.3.2 Collaboration with regulatory, administrative, and judicial authorities is also made, responses regarding information requests are provided within authorization limits and in a fast and accurate manner.

4. ASSIGNMENTS OUTSIDE OF THE GROUP

4.1. REPRESENTATION AND PARTICIPATION IN EVENTS

4.1.1 Employees may attend events of associations and non-governmental organizations in which the Group is a corporate member, once the CEO is informed of such participation.

4.1.2 Participation in events that are not open to general participation that are organized by persons or institutions that are in business relation or establishment process, and that may significantly -damage the impartiality of the employees or create an impression in this regard, are subject to the approval of the CEO.

4.2. ATTENDING EVENTS AS A SPEAKER

- 4.2.1 Employees may attend events (congress, seminar, career days, etc.) as a speaker, upon the opinion of the unit responsible for corporate communications and the approval of the CEO, in a manner not to interrupt the business and violate the confidentiality principle.
- 4.2.2 In case of such participation, the content to be conveyed at the event is shared with the unit in Şişecam that is responsible for corporate communication, following the event.
- 4.2.3 Subject matter of any training planned to be delivered as a trainer in occupational organizations and academic institutions, is subject to the approval of the CEO. Repetition number of the training and the fee to be paid, if any, are submitted to the HR unit for approval.

4.3. WORKING IN COMPANIES OUTSIDE OF THE GROUP

- 4.3.1 A request to work outside of the Group must be submitted for the approval of the CEO in writing through the Human Resources.
- 4.3.2 Even if outside working hours, no paid or unpaid work under the management of another employer or consultancy is allowed without the written permission of the CEO. Teaching at universities and engaging in activities in non-governmental organizations with a fee is an exception and subject to the approval of the CEO.

4.4. SOCIAL RESPONSIBILITY PROJECTS

- 4.4.1 The Şişecam Group supports participating in volunteering and social cooperation projects for creating value and providing social benefit. Adhering to the Code of Conduct, acts responsibly when facing social problems and works for solution. Aims to enrich the social life by supporting cultural, artistic, scientific, and sports activities.
- 4.4.2 Action is taken in line with the positive opinion given by the unit responsible for Şişecam's social responsibility activities. Şişecam employees avoid participating in any social activity that could harm the Group's reputation.

4.5. PERSONAL POLITICAL ACTIVITIES

- 4.5.1 Şişecam Group employees may get involved in or contribute to political activities or social events in line with their personal opinions. However, in the business areas that belong to the Şişecam Group, propaganda on political matters, establishment of any entities named as association or foundations, as well as conducting political activities, are not allowed. In business and private life, politics and political discourses which will damage the reputation of the Group are not demonstrated.

5. PREVENTING CONFLICT OF INTEREST

Conflict of interest is any case whereby employees have interests that prevent or may create a perception that they are prevented from performing their duties within their responsibilities and impartially. Conflict of interest includes all types of tangible and intangible benefits provided to persons or institutions.

5.1 ACTING FOR PERSONAL PURPOSES AND SHOWING NEPOTISM

- 5.1.1** Entering into business relationships with relatives or friends that will provide unilateral or mutual benefits, must be avoided, and such situation shall not be allowed to affect the decisions of the company.
- 5.1.2** If the candidate to be recruited has a line of descent with an employee working in the workplace, they may not be employed in a manner to report to the same manager (first administrative and second manager and, if any, functional first and second manager) or in positions that control/supervise each other, in a subordinate-superior relationship. The "Şişecam Group Global Recruitment Procedure" shall apply. Line of descent means first-degree kinship (spouse, mother, father, child), siblings, and first-degree relatives of the employee and siblings of the employee's spouse. Any person who has a "line of descent" relation with employees who are responsible for auditing the transactions and processes of the Group, with the CEO, Chief Officers, Senior Directors, Directors, and other managers who report directly to the CEO, may not be employed within the Group. In the assignment of personnel working in sub-contractor positions to Şişecam works, care is taken to ensure that there is no line of descent relationship in the unit they serve. Other than the situations described above, recruitment of candidates in monthly-paid positions, that have a line of descent relation with Şişecam Group employees, falls under the authority of the CEO.
- 5.1.3** Employees who are entitled to make recruitment decisions, may not decide in the recruitment of their family members, close relatives and friends.
- 5.1.4** In the event that the suppliers have any family ties or other relationships that may cause conflict of interest with the Group employees they engage with, they must immediately disclose this matter to the Group or have the said Group employee to disclose the matter.

6. COMBATING BRIBERY AND CORRUPTION

- 6.1.** Compliance with laws and regulations regarding bribery and corruption, universal legal principles business ethics and professional principles in all countries where we operate, is adopted as principle.
- 6.2.** For persons within the scope of "Şişecam Group Anti-Bribery and Anti-Corruption Policy"; it is strictly forbidden to make any payment or any offer of value to obtain an illegal and unethical benefit even if in favor of the Group, or to obtain a similar benefit from other organizations and persons, including public institutions, and to be a party to any illegal and unethical behavior that can be considered as bribery or corruption.

- 6.3. The Şişecam Group imposes related disciplinary penalties regardless of the position or identity of the person involved in bribery and corruption and does not tolerate such situations under any circumstances.
- 6.4. All Şişecam employees and business partners acting on behalf of Şişecam or providing services to Şişecam are responsible to accept the Anti-Bribery and Anti-Corruption Policy and to act in compliance with the principles set forth in the policy.
- 6.5. Managers are responsible that business partners and employees under their management read, understand, apply and live the policy principles.
- 6.6. Şişecam employees must report any breach of this policy or suspicious acts to their managers and/or the Ethics Hotline.

7. GIFTS, HOSPITALITY AND DEBT RELATIONS

Employees, suppliers, and persons engaged in commercial relationship are expected to act in compliance with the "Şişecam Group Gift and Hospitality Policy".

- 7.1. Transparency and integrity are essential in identifying stakeholders and in the relations afterwards. Gifts and hospitality that could adversely affect the impartial decision-making capabilities are not accepted, and attitude that may create such a perception must not exhibited.
- 7.2. Getting into relations with suppliers, customers, and other third parties that can create an impression of making a material benefit, such as gifts and hospitality, are not allowed. Except the materials obtained according to the customs and traditions or the souvenir/promotional materials, any gifts that could be perceived as inappropriate or may create impression of the existence of a non-compliance are not accepted or offered.
- 7.3. Şişecam employees may not accept gifts or offer to receive gifts from the main shareholders and/or the companies under main shareholders' management as well as from Group companies.
- 7.4. Şişecam employees may not accept gifts from customers or suppliers from whom their unit purchases goods or services, from shareholders and/or companies under its management, and third parties with whom they have a business relationship, including Şişecam's own companies, and cannot make an offer to request gifts in any manner whatsoever.
- 7.5. In exceptional cases where the employee's will to refuse to accept is not accepted by the other party which arises a risk of harming the business relationship, gifts up to 50 € in accordance with commercial practices can be accepted, provided that they are one-off or irregular.
- 7.6. Impartiality and outcomes of decisions in the business activities shall not be affected because of the proposed gifts and hospitality; moreover, no one shall tried to be influenced through such activities.
- 7.7. Gifts that have symbolic values, such as plaques, prizes, or plates, granted at seminars or meetings that are attended on the behalf of the Group can be accepted.
- 7.8. Gifts up to 50 € may be given to third parties, provided that they are one off or irregular.

- 7.9. Gifts of not high value in ordinary terms may be accepted by Şişecam employees among themselves, by managers from the employees directly or indirectly reporting to them, or by employees from their managers on special days for celebration purposes provided that they do not offer to receive such gifts.
- 7.10. Managers from their employees and employees from their managers, cannot borrow money from each other or ask to be a guarantor for such transactions.

8. PREVENTION OF INSIDER TRADING

- 8.1. Employees cannot use information which has not yet been disclosed to the public, which may affect the value of the company's capital market instruments, for the purpose of gaining personal benefits or for third parties, and cannot provide unfair benefits in a way that disrupts the principle of equal opportunity.
- 8.2. Employees are prohibited to buy or sell marketable securities based on the information they have or to take any action that may affect the value of the marketable securities.
- 8.3. Employees, who are prohibited to invest in stocks of the Group's publicly listed companies, cannot either invest on behalf of family members, close relatives, and friends.

9. FORMER EMPLOYEES DOING BUSINESS WITH THE GROUP

- 9.1. In the proposals submitted by the companies where former employees of the Group are directly/indirectly partners or employees and in all business done with such companies, this situation must be explicitly stated.
- 9.2. Business relations cannot be established under any circumstances with a former employee who has left the Group due to acts in violation of the Code of Conduct.

10. SUPPLIER SELECTION AND MANAGEMENT

- 10.1. In companies providing outsourced services, persons with line of descent relations cannot work in Şişecam workplaces, and no recommendation can be made for their employment.
- 10.2. If a Şişecam employee has a line of descent relation with an outsourcing company or a supplier, approval of the Ethics Board is required. Anyone who becomes aware of such situation is obliged to report.
- 10.3. Our suppliers and business partners must comply with "*Şişecam Group Supplier Code of Conduct*" and "*Şişecam Anti-Bribery and Anti-Corruption Policy*".

11. DONATIONS

Provided that they are compatible with Şişecam's principles and guidelines, donations can be made on education, health, culture, law, arts, scientific research, environmental protection, sports and similar social matters of the country, without any returns, and for the purposes of contributing positively to the public perception of the Company's sensitivity to social responsibility. Employees, suppliers, and persons engaged with in commercial relationships are expected to act in



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compliance with the "*Şişecam Group Donations Policy*". No political donations can be made on behalf of the company.

12. PREVENTION OF HARASSMENT AND BULLYING

- 12.1. Any kind of physical, sexual, psychological harassment, bullying and violent behavior are never allowed. As stated in article 1.6., in case of attitudes and behaviors contrary to this provision, disciplinary penalties are applied by Şişecam Group regardless of the person's position or identity, and such situation is not tolerated under any circumstances.
- 12.2. Insulting, making obscene jokes/emailing/texting, threatening, humiliating, discrimination, bullying and other similar behaviors related to race, age, job, gender, religion, sect, country, sexual orientation, marital status, dependents, disability, social class or political views, by employees are not allowed. Any employee experiencing or witnessing any of these behaviors must report to their managers or the Ethics Hotline or hotline e-mail address.

13. USE OF SOCIAL MEDIA

It is essential that social media is used in accordance with the code of conduct and the Company's privacy, information management and security policies.

Employees are expected to contribute to the corporate culture in matters related to the Company and to be good brand ambassadors by reflecting the corporate values in their use of social media, additionally, to avoid content that may cause undesirable results on a personal and corporate level.

Employees cannot post or make any comments on social media that may damage their personal reputation as well as the reputation of Şişecam Group.

They must comply with the Company's privacy and must not share any details which may pose risks from security and competition perspectives, office information and meeting contents. They cannot make any statements involving hate, hatred, unethical, political or insulting connotations; cannot use discriminatory, harassing, offensive, racist, sexual, ethnic, religious, offensive and humiliating expressions.

14. OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL AWARENESS

- 14.1. All employees, suppliers and business partners are provided with a working environment in line with the "*Şişecam Group Occupational Health and Safety Policy*" in order to create a healthy, safe and humane working environment.
- 14.2. To ensure sustainable growth in our activities, we act in line with the "*Şişecam Group Environment and Energy Policy*", with the awareness of sustainable environment and energy management principles.

15. EXECUTION OF THE CODE OF CONDUCT - DOCUMENT HISTORY

15.1. OBLIGATIONS

"Şişecam Group Code of Conduct" is adopted, and any behavior against the code shall not be exhibited. Common sense is used in all activities and decisions, compliance with laws is scrutinized, and compliance with the principles of fairness and accuracy is questioned. The Group's Board of Directors, Executive Board, managers and the Group employees are responsible for the execution of the "Şişecam Group Code of Conduct". Any updates in the Code of Conduct shall be announced to the employees and business partners.

15.1.1. Board of Directors and Corporate Governance Committee

- 15.1.1.1 The Board of Directors, Corporate Governance Committee and the Ethics Board reporting to the Corporate Governance Committee are ultimately responsible to ensure the implementation of the Code of Conduct.
- 15.1.1.2 The Board of Directors and the Corporate Governance Committee adopts the Code of Conduct and complies with these principles. They support the establishment of the necessary culture inside the Group, for the implementation of the Code of Conduct.
- 15.1.1.3 Ensures the necessary communication channels to be available for acts against the Code of Conduct to be reported.
- 15.1.1.4 The members of the Board of Directors must at least comply with these principles. Dealings regarding the members of the Board of Directors are carried out according to the "Şişecam Group Corporate Governance Regulation".

15.1.2. Managers

- 15.1.2.1. All managers accept the Code of Conduct, comply with these principles and lead other employees by example. Managers ensure that the Code of Conduct is primarily adopted in the units for which they are responsible, that it is understood and implemented by the employees, and supports the activities within the scope of its adoption throughout the Group.
- 15.1.2.2. They evaluate the business processes in their field of duty within the framework of the Code of Conduct, identify breaches, and take the necessary measures to ensure compliance.
- 15.1.2.3. They listen to the employee questions, complaints, suggestions and requests regarding the Code of Conduct and support employees to convey their feedback. Managers cannot force employees to act against the Code of Conduct under any reason or circumstances, and in case of forcing, disciplinary provisions apply.



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15.1.3. Group Employees

15.1.3.1 All Group Employees accept the Code of Conduct, comprehend and apply in full, the regulations, procedures and instructions related to their field of duties and to the Group in general. They encourage their colleagues in this respect.

15.1.3.2 If a behavior and action contrary to the Code of Conduct is witnessed, they report to their managers and the Ethics Hotline via the communication channels specified below.

15.2. IDENTIFICATION OF VIOLATIONS AGAINST THE CODE OF CONDUCT AND ACTIONS TO TAKE

15.2.1. Reporting Violations of Code of Conduct and Assessment

15.2.1.1 If the employees become aware of, suspect or witness a violation of the Code of conduct or the laws and regulations to which the company is subject to; they should primarily report to the department manager, if reporting to the department manager is not appropriate, then they should report to Ethics Hotline or e-mail address. For reporting from outside the company, the "Contact Us" tab under the Communication section in our website, can be used.

15.2.1.2 In any case, the reports are forwarded to the Ethics Board Reporter and examined by the Reporter.

15.2.1.3 As a result of the evaluation, if it is considered that a breach of business conduct has occurred; the procedures in the article 15.3 prevails.

15.3. ACTIONS TO TAKE WHEN A VIOLATION OF THE CODE OF CONDUCT IS DETECTED

15.3.1 The investigation to be conducted on the determining the violation is kept confidential. The identity of the reporting person remains strictly confidential. Any situation that can cause retaliation and unrest in the work environment is avoided.

15.3.2 During the evaluation of the complaints and notices received by the Ethics Board, if a suspicious situation regarding the violation of the provisions of the "Şişecam Group Code of Conduct" is detected, the issue is reported to the Audit Committee and the Disciplinary Board, and penalties may be imposed if deemed necessary. If no investigation is required, the process is completed within 15 business days.

15.4. ETHICS HOTLINE

15.4.1 Anyone, who becomes aware that an activity or a decision is against the Şişecam Group Code of Conduct, or who are hesitant about compliance, shall report the matter to the Ethics Hotline.

15.4.2 **Ethics Hotline:** [https:// ethicshotline.sisecam.com](https://ethicshotline.sisecam.com)

Turkey/0800 621 2393, Austria/0800 017855, Bosnia & Herzegovina/080 083 067, Bulgaria/0800 46 269 China/400 120 0275, Egypt/0800 006 0316, Georgia/0800 10 02 50, Germany/0800 180



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0655, Hungary/80 088 538, India/000 800 919 0261, Italy/800 828 488, Netherlands/0800 022 2904, Romania/0800 360 147, Russia/8 800 301 85 34, Slovakia/0800 601 478, Spain/900 876 290, Ukraine/0800 801 480, USA/1 800 508 1753

16. RELATED DOCUMENTS

- Şişecam Group Supplier Code of Conduct
- Şişecam Group Diversity and Inclusion Guidelines
- Şişecam Group Disciplinary Regulation
- Şişecam Group Information Security Management Policy
- Şişecam Group Global Recruitment Procedure
- Şişecam Group Anti-Bribery and Anti-Corruption Policy
- Şişecam Group Occupational Health and Safety Policy
- Şişecam Group Environment and Energy Policy
- Şişecam Group Gifts and Hospitality Policy
- Şişecam Group Donations Policy
- Şişecam Group Donations Regulation