

# Code of Conduct

## TANSA Code of Conduct

Full Version



# TANSA Code of Conduct

**TANSA** is a leading manufacturer of turnstiles and entrance control gates, renowned for its excellence in designing and producing innovative passage systems worldwide. Our commitment to technological innovation is matched by our dedication to strong work ethics and professionalism. Each of us, as representatives of **TANSA**, has a responsibility to uphold these values at every level.

At **TANSA**, we consider the principles of honesty, transparency, responsibility, and fairness as the foundations of our business operations. These values are reflected in our approach to our customers and business partners, the quality of our products, and in every stage of our processes.

Therefore, we invite you to carefully review the **TANSA** Code of Conduct and apply its rules diligently in your daily work. These rules aim not only to comply with legal requirements but also to ensure respect, equality, and integrity. Compliance with these rules by each of us is key to **TANSA**'s long-term success and will lay the foundation for our dignity in the industry.

You can safely report any ethical concerns or rule violations you encounter through our communication channels. As the management team, we take such notifications seriously and are committed to taking all necessary steps.

Remember, each one of us is an ambassador for **TANSA**'s values and reputation. Together, we can build a fair and respectful work environment, not just for today but also for future generations.

We thank you for your commitment and excellence on this journey. Together, we hope to reach new heights in our field through your work ethic and professionalism.

Regards,

**Mehmet Yalçın Sarı**

Chairman of the Board of Directors

**Mete Tansal Akçaylı**

Vice Chairman of the Board of Directors

Contents

- 1. Purpose .....1
- 2. Definitions .....1
- 3. Our Responsibility as a Member of Society.....6
- 4. Our Responsibility as a Business partner.....8
- 5. Our Responsibility at Work.....12
- 6. Support .....13
- 7. Responsibilities .....10
- 7.1 Legal Responsibilities .....10
- 8. Code of Conduct Implementation .....12
- 8.1 Violations Notification Liability .....14
- 8.2 Discipline Application .....12
- 8.3 Ethics Committee .....13

## 1. Purpose

The purpose of the **TANSA** Code of Conduct is to ensure that business relations are conducted by adopting the fundamental principle of providing an honest, fair, environmentally friendly, and socially respectful working environment. The Code of Conduct outlines the standards of responsible behaviour that must be followed and offers guidance on addressing significant ethical issues. Therefore, compliance with the **TANSA** Code of Conduct is critical to **TANSA**'s success and social reputation.

In summary, the Rules of Conduct at **TANSA** Güvenlik Sistemleri ve Saat San. Tic. A.Ş. ("**TANSA**") cover all employees' interactions and business dealings within and outside of **TANSA**, including those with other employees, customers, suppliers, competitors, public institutions, and society at large. These rules form the basis of **TANSA**'s business conduct and include fundamental principles such as honesty, equality, justice, respect for human rights, and social responsibility, guiding our actions in alignment with these principles. These principles of conduct aim to contribute to **TANSA**'s long-term success and societal well-being by fostering a sustainable business environment.

All parties involved in business relations, including employees, should be familiar with these regulations, adopt them, and comply with them. Employees facing potential violations or inconsistencies concerning themselves or others are encouraged to seek guidance from their managers or the Human Resources Department. Any detected inconsistency or non-compliance must be reported to the Ethics Committee via the **TANSA** Reporting Line. If deemed appropriate, the Ethics Committee appoints the Human Resources Committee to investigate violations and take corrective action, and notifies the Resources Manager. The Board of Directors, Ethics Committee, and Human Resources collaborate to resolve such issues.

## 2. Definitions

- **Donation**  
Donation refers to financial or in-kind support provided to associations, educational institutions, health services, cultural organizations, and other public entities working for public benefit. This support is offered without any expectation of financial return, generally aiming to enhance societal well-being.
- **Conflict of Interest**  
A conflict of interest arises when employees, their family members, or friends are in a position that might interfere with their duty to act impartially and in the best interest of **TANSA**. It involves mixing personal interests with those of **TANSA**.
- **Ethics**  
Ethics is the discipline that determines the difference between right and wrong and embodies the responsibility to act correctly. It underpins the behavior and decisions of individuals and institutions, encompassing values such as honesty, justice, respect, and responsibility.
- **TANSA Reporting Line**  
The **TANSA** Reporting Line is a communication channel through which employees or other stakeholders can report unethical or illegal behavior within or outside of **TANSA**.

➤ **Ethics Committee**

The Ethics Committee is responsible for establishing, monitoring, and enforcing ethical standards within **TANSA**.

➤ **Confidential Information**

This refers to all kinds of **TANSA** specific financial, strategic, or technical data that has not been disclosed to third parties.

➤ **Stakeholder**

The term encompasses all parties involved in a relationship with **TANSA**, including shareholders, employees, customers, suppliers, and business partners.

➤ **Bribery**

Bribery involves offering, giving, receiving, or soliciting something of value to influence the actions of an official or other person in charge of a public or legal duty.

➤ **Sponsorship**

Sponsorship by **TANSA** involves allocating financial or other resources to support specific activities, projects, or endeavors, often within a mutually beneficial relationship that aims to enhance **TANSA's** brand value and social image.

➤ **Irregularity**

This refers to any transaction, process, or activity not conducted according to appropriate procedures or legal requirements.

➤ **Corruption**

Corruption involves exploiting one's official position for personal gain or to provide unfair advantages to others, either directly or indirectly.

➤ **Management board**

The **TANSA** Management Board consists of members appointed from within the shareholders and independent members from outside the organization.

➤ **Work Ethics**

**TANSA** and its employees are committed to foundational values such as honesty, justice, responsibility, and trust, guiding their actions within the business world. **TANSA** Code of Conduct is designed to demonstrate the correct approach to business relations and decision-making processes. It serves as both a guide and a compass, showing the ethical path for conducting business.

**TANSA** conducts its operations in accordance with the principles outlined in the **TANSA** Code of Conduct, adhering to sector-specific standards and relevant local and international regulations. In cases where sector standards and legal regulations are unclear, **TANSA's** actions continue to be guided by its Code of Conduct.

- **Honesty**  
**TANSA** consistently adheres to being truthful and honest in all interactions. It aims to create a transparent and reliable environment. **TANSA** and its employees strive to maintain honesty at every step and continue to be a trusted business partner to all stakeholders. However, maintaining honesty is not solely the responsibility of **TANSA**'s internal teams but also involves the support and involvement of all stakeholders.
- **Security**  
The disclosure of confidential information could potentially harm **TANSA** and its stakeholders or provide an advantage to others. Therefore, safeguarding all confidential information is a crucial responsibility for all employees and stakeholders.

### **3. Our Responsibility as a Community Member**

#### **3.1 Human rights**

**TANSA**'s commitment to high-quality human resources management is supported by a set of principled guidelines. The foundation of these principles is the value and respect given to each individual, and the development of a collaborative working environment. **TANSA** ensures the full protection of its employees' personal rights and provides extensive opportunities for their education and development, aiming to enable them to succeed in their roles. **TANSA** strives to appreciate and celebrate its employees' achievements, build trust, and places great importance on developing a supportive culture. This contributes to **TANSA**'s overall success and supports individual development through teamwork and collaboration.

#### **3.2 Equal Opportunity and Equal Treatment**

**TANSA** establishes honest and open business relations with all stakeholders, maintaining equal distance and upholding individuals' rights and freedoms wherever it operates. **TANSA** does not discriminate based on gender, ethnic origin, race, economic status, religion, or any other beliefs.

This policy applies to recruitment and promotions, working conditions, and all dealings with suppliers and customers. **TANSA** also promotes and strives for fair competition in business relations, ensuring that it adheres to ethical principles and contributes to creating a fair competitive environment.

#### **3.3 Product Compliance and Safety**

Countless people interact with our products and services daily. **TANSA** is responsible for minimizing the risks, disadvantages, and dangers related to health, safety, the environment, and property that may arise from these interactions. This is not only a legal obligation but also our goal to ensure that our products comply with applicable legal and governmental regulations and internal standards.

Our products are developed using state-of-the-art technology and comply with legal requirements. Regulations and structural guidelines ensure continuous and systematic monitoring of our turnstiles and products. We make no compromises here and promptly implement appropriate measures in case of any

deviations.

### **3.4 Environmental Protection**

Our principle of social responsibility includes increasing the positive impact on **TANSA**'s reputation and achieving benefits. It also encompasses an attitude of respect for the environment and society, creating a sustainable and socially responsible organizational structure. Together with our employees and stakeholders, we act with environmental awareness and responsibility, striving to minimize environmental impacts and contribute to society.

### **3.5 Donations, Sponsorship and Charity**

**TANSA** manages donation and sponsorship activities within a framework of core principles such as legal compliance, ethical standards, transparency, accountability, and social sensitivity. Decisions on donations and sponsorships are made with long-term effects and societal benefits in mind, ensuring that these activities do not involve bribery, corruption, or irregularity. Donations to politicians, government officials, or political parties for political purposes are strictly prohibited. Activities are carried out transparently and documented annually by the Management Board and reported to the Board of Directors.

**TANSA** bases its donation and sponsorship decisions on strategic goals and evaluates their social impact meticulously. It ensures that the selected parties are compatible with **TANSA** values and avoids relationships that could risk its reputation. Risks arising from the nature of the activities are proactively managed and minimized. Requests are received in writing, evaluated, and decisions are made with a focus on transparency, equality, and justice, adhering to ethical values and compliance with laws and **TANSA** regulations.

*Detailed information for this is available in the **TANSA** "TP 05.04 Donation, Sponsorship and Charity Policy" Please review.*

### **3.6 Communication and Marketing**

**TANSA** values open and clear communication with its employees, business partners, shareholders, investors, the press, and other stakeholders, maintaining honesty and legality. Each employee is responsible for adhering to internal company rules in communication to ensure a united and consistent representation of **TANSA**.

We prioritize clear communication to gain the trust of our customers and stakeholders, coordinating with the communications and marketing department before implementing communication and marketing strategies.

### **3.7 Political Interest Representation**

Politics and legislation influence the economic framework conditions for our business activities. **TANSA** participates in political interest representation (lobbying), which may involve corporate matters.

Our lobbying activities are conducted centrally, adhering to principles of openness, transparency, and responsibility. Impartiality in relations with political parties and interest groups is fundamental to us, and undue influence on politics and legislation is prohibited.

## **4. Our Responsibility as a Business Partner**

### **4.1 Conflicts of Interest**

Avoiding situations that could lead to conflicts of interest is one of **TANSA's** most important concerns. All employees and stakeholders are required to demonstrate due diligence to prevent such conflicts before establishing any business relationship with a third party. Should conflicts of interest arise, they are managed through legal and ethical means to protect all parties involved. In cases of doubt, consultations with managers, the Human Resources Department, or the Ethics Board are encouraged.

### **4.2 Gifts, Entertainment and Invitations to Events**

**TANSA** mandates that its employees must not accept any gains, benefits, special discounts, commissions, or rewards that could influence their decisions or behaviors. Furthermore, it is strictly prohibited for employees to accept money, whether free or as a loan, from subcontractors, contractors, suppliers, competitors, or customers.

However, certain conditions permit employees to offer or receive entertainment, treats, and meals that meet acceptable standards within the workplace. Participation in seminars and similar events on behalf of **TANSA** may include accepting symbolic awards or souvenirs, other than monetary gifts, which are deemed acceptable.

All gifts received or given must fall within the regulatory limits stated in **TANSA's** policies, and all must be reported to **TANSA** managers. Additionally, the Human Resources Manager should be informed about these gifts to prevent ethical violations and ensure transparency. A record of all accepted and rejected gifts is maintained in the Gift and Hospitality Inventory to ensure transparency in the event of future audits or inquiries.

*Detailed information for this is available in the **TANSA** "TP 05.03 Gifts, Entertainment and Invitations to Events Policy" Please review.*

### **4.3 Prohibition of Corruption**

**TANSA**, aligned with the Anti-Bribery and Corruption Regulation, clearly outlines its stance against bribery and corruption. It provides guidance on the prevention, detection, and combating of such violations, emphasizing **TANSA's** commitment to honesty and social responsibility.

**TANSA** adopts a zero-tolerance policy towards any bribery or corruption activities and remains stringently committed to this principle in all dealings with third parties. By fully complying with national and international anti-bribery and corruption laws and agreements, **TANSA** demonstrates its determination to fight corruption.



In its commercial relationships, **TANSA** ensures that any representation, hospitality, or gifting activities, as well as donations and sponsorships, remain within reasonable and professional limits. The timing, scope, and purpose of these activities are meticulously evaluated to ensure full adherence to principles of transparency, equality, and justice.

**TANSA** does not permit facilitation payments intended to expedite transactions with public institutions, and strictly prohibits political donations, maintaining impartiality in political processes.

*Detailed information for this is available in the **TANSA** “TP 15.01 Prohibition of Corruption Policy” Please review.*

#### **4.4 Relations with Office Holders and Elected People**

Special legal conditions apply when dealing with office holders, elected officials, governments, and other public institutions. Even minor violations in these relationships can have significant consequences, potentially resulting in bans from public tenders indefinitely.

We manage our interactions with office holders and elected officials strictly according to the law and relevant regulations, ensuring no conflicts of interest or corruption, including the prohibition of **facilitation payments**.

#### **4.5 Consultants and Brokers**

**TANSA** engages external consultants to support sales activities in various fields. Since these consultants are not **TANSA** employees, there is no guarantee they will adhere to **TANSA**'s ethical standards. It is crucial to monitor the use of consultants to mitigate any risks of corruption. Any legal violations by consultants can damage **TANSA**'s reputation and result in liabilities and significant fines.

Consultants must be used in accordance with legal regulations and **TANSA**'s policies on business engagement, ensuring payments are made only for actual consultancy services at reasonable rates.

#### **4.6 Prohibition of Money Laundering and Terrorism Financing**

Global laws against money laundering and terrorism financing are stringent. Money laundering involves disguising the origins of money obtained from criminal activities, and terrorism financing pertains to the use of funds to support terrorist acts. Involvement in these activities, even unintentionally, can lead to severe penalties.

We rigorously verify the identities of our customers, business partners, and other third parties, ensuring all business interactions are with reputable partners who comply with legal standards. We assign and record incoming payments promptly, maintaining transparency in our payment flows.

*Detailed information for this is available in the **TANSA** “TP 15.02 Prohibition of Money Laundering and Terrorism Financing Policy” Please review.*

#### **4.7 Accounting and Financial Report Editing**

Proper accounting and flawless financial reporting are essential for **TANSA** to gain and maintain the

trust of the public, its shareholders, and contractual partners. Irregularities could lead to serious consequences for both the company and those responsible.

We strictly adhere to the legal framework for accounting and financial reporting, prioritizing transparency and accuracy. We regularly update our partners on the company's financial status and the flow of commercial activities and ensure that our period balance sheets, prepared according to national and international accounting standards, are disclosed in a timely manner.

*Detailed information for this is available in the **TANSA** "TP 02.01 Accounting Policy" Please review.*

#### **4.8 Taxes and Customs Taxes and Duties**

Our global operations and expansion into new markets require adherence to a broad spectrum of legal regulations, including those related to foreign trade, taxes, and customs. Compliance with these regulations builds trust among customers, financial authorities, and the public. Non-compliance can result in significant financial losses and damage to **TANSA**'s reputation, potentially leading to negative consequences for the responsible personnel.

We are fully aware of our tax and customs obligations and commit to complying with both national and international legal standards.

#### **4.9 Fair and Free Competition**

Fair and free competition is protected by applicable competition and cartel laws. Compliance with these laws ensures that competition in the market is not distorted, for the good of all participants. These laws specifically prohibit agreements or acts based on agreements that aim or cause the prevention or restriction of free competition between competitors. Abuse of market dominant position is not allowed. This type of abuse; For example, this may be the case of treating customers differently without any objective justification (discrimination), refraining from sales/delivery, applying unreasonable (exorbitant) purchase and sales prices, or related work that is not based on objective justifications for the requested extra work or services. Anti-competitive behavior not only causes serious damage to **TANSA**'s reputation and reputation, but can also lead to heavy fines and imprisonment.

We carry out commercial activities only on a profit-oriented (performance-based) and market economy basis and on the basis of free and unhindered competition. We happily compete with our competitors and in doing so always adhere to the law and the law as well as ethical fundamental principles. We never make anti-competitive compromises with our competitors

We comply with specific cartel law framework conditions regarding sales systems in our relations with our authorized sales partners.

#### **4.10 Purchasing**

**TANSA** has contractual relationships with many suppliers and service providers in its commercial activities. We carefully select our suppliers and service providers based on objective criteria.

In purchasing products and services, we engage authorized Purchasing departments in accordance with the current **TANSA** TP 16.01 Purchasing Policy.

Detailed information for this is available in the **TANSA** "TP 16.01 Purchasing Policy" Please review.

#### **4.11 Export Control**

Trade across borders is subject to bans, restrictions, permit requirements, or other control measures under the scope of export control. In addition to goods, technology and software are also included in the scope of export control legislation. The legislation covers not only actual exports but also temporary exports, such as taking objects or technical drawings abroad on business trips, as well as technical transfers, for example, via email or cloud services.

Trading with persons or entities on sanctions lists is strictly prohibited, regardless of the delivery process.

Our company is diligent in complying with all regulations regarding the import and export of goods, services, and information.

#### **4.12 Prohibition of Insider Trading**

Legal requirements, particularly the Market Abuse Regulation (MAR) in Europe, prohibit the use and disclosure of inside information when acquiring or disposing of shares or other securities or financial instruments. This prohibition also applies to advising third parties or causing third parties to engage in insider trading or unlawful disclosure of inside information. Relevant national legislation may also stipulate additional prohibitions. Insider information is sensitive information that has not been disclosed to the public and could significantly affect the exchange rate of securities, such as **TANSA** shares or financial instruments, if it were made public.

We handle inside information that may affect the stock exchange rate in accordance with the provisions of capital markets legislation and do not permit insider trading. We only use information about insiders' intentions and events within the scope of applicable internal regulations and do not disclose it to anyone outside the company, including family members such as spouses.

### **5. Our Responsibility at Work**

#### **5.1 Occupational Safety and Protection of Worker Health**

**TANSA** takes its responsibility for the safety and health of its employees very seriously. Our company ensures the protection of occupational safety and worker health within the framework of the relevant legislation and according to the company's own occupational safety and health regulations.

We continuously improve working conditions and offer versatile and diverse measures for prevention and health promotion to maintain and support the health, performance, and job satisfaction of our employees.

#### **5.2 Data Protection**

Special legal regulations have been established regarding the use of personal data to protect an individual's private life. The collection, storage, processing, deletion, and other uses of personal data

essentially require the consent of the data subject, a contractual arrangement, or another legal basis.

We protect the personal data of our current and former employees, customers, suppliers, and other stakeholders. We collect, compile, use, and store personal data strictly in accordance with legal provisions.

### **5.3 Security and Protection of Information, Information and Intellectual Property**

Employees must ensure the confidentiality of data within **TANSA** and of all stakeholders. This information should only be shared with official personnel and in work-required situations. Security sensitivities and responsibilities regarding this issue continue even after an employee's relationship with **TANSA** has ended. Employees must return all documents and electronic data they have acquired upon leaving their jobs, maintaining confidentiality of all confidential information.

It is the responsibility of all employees and stakeholders to prevent breaches of this information. Maintaining the security, respect, and confidentiality of **TANSA's** and its stakeholders' confidential information is critically important for the company's reputation, reliability, and sustainability.

### **5.4 IT and Information Security**

Information technology (IT) or electronic data processing (EDP) is integral to **TANSA's** daily operations but also presents numerous risks. These include adverse effects on data processing from malicious programs (viruses), data loss due to program errors, or misuse of data (e.g., by hackers).

We are vigilant about IT and EDP security and comply with applicable legislation.

### **5.5 Use of Company Assets**

**TANSA's** tangible and intangible assets aid our employees in achieving the company's business goals and should only be used within the framework of company regulations. These assets must not be used for non-business purposes.

## **6. Support**

### **6.1 Employee Representation**

We recognize the fundamental right of all our employees to establish employee representations. In order to cooperate openly and safely with employee representatives, we commit to maintaining a constructive and cooperative dialogue and strive for a fair balance of interests. Our professional approach ensures that there is no bias in giving priority or creating disadvantages through employee representation. This is a part of **TANSA's** corporate culture.

Securing the future of **TANSA** and its employees through collaborative conflict management aims at enhancing economic and technological competitiveness and is carried out in the spirit of social responsibility. Profitability and employment security are considered equal and complementary targets.

## 6.2 Help / Contact

If you have questions or are unsure about the **TANSA** Code of Conduct, your first point of contact should be your supervisor. Additionally, each of us can confidently contact the relevant Compliance Officer. All notifications will remain anonymous.

**WEB Reporting Line** : [www.tansa.com.tr/kurumsal/webbildirim](http://www.tansa.com.tr/kurumsal/webbildirim)

**E-Mail Notification** : [code@tansa.com.tr](mailto:code@tansa.com.tr)

**Telephone Reporting Line** : +90 216 561 96 71 Ext. 8

Furthermore, if we have questions, we can also reach out to other internal departments such as the Human Resources Department, Employee Representation, or the relevant specialist department.

Complaints can be directed to our manager, authorized Compliance Officer, authorized Personnel Department, or specialized units within the scope of current company regulations.

## 7. Responsibilities

**TANSA** aspect all work in your life, legal your responsibilities well order; to employees, to customers, supplier and work to its partners, to competitors, to society and to humanity opposite below sorted responsibilities take care to fulfill is shown.

### 7.1 Legal Responsibilities

**TANSA** conducts its operations professionally, adhering to applicable laws, regulations, and technical standards, as well as **TANSA**'s own regulations and strategies. The company ensures compliance with all legal and contractual obligations in its activities and expects the same level of compliance and loyalty from all related parties and employees.

**TANSA** maintains its commercial obligations timely and completely, continuing its activities both domestically and internationally in compliance with local and international legislation. All **TANSA** employees are expected to adhere to the Labor Law, Criminal Law, Personal Data Protection Law, and other relevant regulations. Unethical behaviors such as irregularities, bribery, and misleading reporting are strictly prohibited.

**TANSA** respects all legal rules and moral values in the countries where it operates and takes necessary precautions to prevent unethical behaviors.

### 7.2 Responsibilities to Customers

Respecting customers' rights, ensuring reliability, and prioritizing their satisfaction are fundamental to

**TANSA.** The company operates with a customer satisfaction-focused approach, responding to customers' needs and demands in the shortest, most accurate, and most effective manner possible.

**TANSA** remains committed to its responsibilities towards customers, emphasizing honesty and transparency in customer relations. Ethical rules are adhered to while responding to customer needs. Communication channels are kept open and accessible to address any issues with products or services promptly and supportively.

### **7.3 Responsibilities to Employees**

**TANSA** values and respects the ideas of individuals, expecting all employees and stakeholders to demonstrate the same care. The company promotes open and transparent communication, valuing diverse perspectives to foster a collaborative environment.

**TANSA** ensures the full and correct implementation of employees' personal rights, commits to a safe and healthy working environment, and places importance on talent development and education to enhance motivation and productivity.

### **7.4 Responsibilities to Suppliers/Business Partners**

**TANSA** ensures an equal and fair approach to suppliers and all business partners during business processes. The principle of equality is upheld among suppliers and business partners, with initiatives focused on social responsibilities such as promoting health and well-being.

**TANSA** transparently reports supplier working conditions to relevant institutions and ensures that all proposals are evaluated objectively, maintaining the confidentiality of information within legal boundaries.

### **7.5 Responsibilities to Competitors**

**TANSA** competes according to laws, statutes, and regulations, avoiding unfair practices and adhering to the principle of fair treatment towards competitors. The company ensures ethical behavior to maintain competition that is fair and transparent, adhering strictly to competition rules. Unethical practices like stealing trade secrets or accessing competitors' confidential information for unfair advantages are strictly avoided. **TANSA** supports a healthy competitive market environment that encourages innovation.

### **7.6 Responsibilities to Society and Humanity**

**TANSA** prioritizes human rights, environmental sustainability, and the respect for democratic, national, and international customs and traditions. The company treats public institutions, political parties, and NGOs impartially and fairly, demonstrating transparency and accountability. Responsive actions are taken to positively impact the communities served.

**TANSA** actively participates in various social responsibility projects and humanitarian efforts, contributing to education, health, environmental protection, and social justice to enhance societal welfare and support the development of a fair and sustainable world.

## 8. Code of Conduct Implementation

If employees do not adhere to the principles of the Code of Conduct or **TANSA's** regulations and procedures, their actions may lead to termination of their employment contract and subject them to disciplinary investigations. During such investigations, those who are aware of potential violations but do not report them, approve of inappropriate behaviors, or govern such actions are also held accountable.

Employees must understand, accept, and perform their specified tasks, making ethical behavior a habit in their job. Lack of knowledge about the **TANSA** Code of Conduct regulations does not exempt them from their responsibilities.

### 8.1 Notification of Violations

The Code of Conduct is aligned with **TANSA's** ethical principles and values. Employees who learn of or suspect any situations that contradict this guide or violate legal regulations to which **TANSA** is subject are obliged to report these through the Ethics Notification Line.

The identities of those making notifications and complaints are kept confidential and are not disclosed to third parties. Care is taken to protect the anonymity and privacy of individuals involved during the investigation process.

Any employee who reports in good faith will not face threats or harm either at or outside the workplace. Deliberately wrong or defamatory statements are considered violations of ethical standards and are subject to disciplinary action.

In cases of suspected violations of this regulation, the laws of the relevant country, or internal **TANSA** regulations, the Ethics Committee should be contacted through the following channels:

**WEB Reporting Line** : [www.tansa.com.tr/kurumsal/webbildirim](http://www.tansa.com.tr/kurumsal/webbildirim)

**E-Mail Notification** : [code@tansa.com.tr](mailto:code@tansa.com.tr)

**Telephone Reporting Line** : +90 216 561 96 71 Ext. 8

### 8.2 Discipline Application

Violations reported to **TANSA** are handled according to established procedures and resolved accordingly. The Ethics Committee reviews reported violations and, if necessary, forwards issues to the Human Resources. The HR may seek guidance from the Ethics Committee as needed.

Violations of the **TANSA** Code of Conduct and/or regulations may lead to various disciplinary sanctions, including termination of employment.

*Detailed information for this is available in the **TANSA** "TP 12.03 Discipline Policy" Please review.*

### 8.3 Ethic Committee

The Ethics Committee is responsible for handling complaints and reviewing notifications about violations of the **TANSA** Code of Conduct. After reviewing all notifications received, the Committee is responsible for investigating potential violations and taking appropriate action. Cases requiring further action are referred to the Human Resource.

The Ethics Committee comprises the following positions:

- Ethic Committee President : General Manager
- Ethic Committee Member of : Compliance Officer
- Ethic Committee Member : **TANSA** Lawyer

Notifications are handled promptly, and the investigation process begins immediately. The Committee may consult experts in legal, social, financial, and medical matters as necessary.