

## 1. OUR BUSINESS ETHICS RULES

### 1.1. Integrity

We act with honesty and integrity in our relationships with employees and all stakeholders.

### 1.2. Confidentiality

Confidential and private information includes:

Information that could create a competitive disadvantage for Silvan Sanayi A.Ş., trade secrets, financial and other information not yet disclosed to the public, employee personal rights information, and information covered by "confidentiality agreements" with third parties.

As employees of Silvan Sanayi A.Ş., we take care to protect the confidentiality and private information of our customers, employees, and other relevant individuals and organizations we work with. We protect confidential information related to our company's activities and use such information only for the purposes of Silvan Sanayi A.Ş.; we share this information only with authorized persons within the defined limits.

For us, it is absolutely unacceptable to obtain any commercial benefit by leaking any confidential information belonging to our company. Even when leaving the company, we do not take out confidential information and documents or project, regulation, etc. works that we have access to due to our duties.

### 1.3. Conflict of Interest

As employees of Silvan Sanayi A.Ş., we aim to avoid conflicts of interest. We do not gain personal benefits from individuals or organizations we have business relations with through our current position, either personally or through our family or close relatives. We do not engage in additional financial business activities outside our company. We refrain from using the name and power of Silvan Sanayi A.Ş., or our identity, for personal gain.

In cases of potential conflicts of interest, when we believe that the interests of the involved parties can be securely protected through legal and ethical methods, we apply these methods. In situations where we are uncertain, we consult our manager or the Human Resources Department.

## 2. OUR RESPONSIBILITIES

In addition to our legal responsibilities, we make every effort to fulfill the responsibilities listed below towards our customers, employees, shareholders, suppliers and partners, competitors, society, humanity, and on behalf of Silvan Sanayi A.Ş.

## 2.1. Our Legal Responsibilities

We conduct all our domestic and international activities and operations within the framework of the laws of the Republic of Turkey and international law, providing accurate, complete, and understandable information to legal regulatory institutions and organizations in a timely manner.

While conducting all our activities and operations, we maintain an impartial stance toward all public institutions and organizations without any expectation of benefit.

## 2.2. Our Responsibilities to Our Customers

Silvan Sanayi A.Ş. works with a customer satisfaction-focused, proactive approach that responds to the needs and demands of its customers as quickly and accurately as possible. Silvan Sanayi A.Ş. treats all its customers honestly and fairly and makes the necessary effort to fulfill its commitments to them on time and under the promised conditions.

## 2.3. Our Responsibilities to Our Employees

Silvan Sanayi A.Ş. ensures that employees' personal rights are fully and correctly exercised. We approach employees with honesty and fairness, committing to a non-discriminatory, safe, and healthy working environment. We make efforts to support the individual development of our employees and encourage their voluntary participation in appropriate social and community activities with a sense of social responsibility.

## 2.4. Our Responsibilities to Our Partners

We prioritize the continuity of Silvan Sanayi A.Ş. and aim for profitability. We act within the framework of accountability, managing our resources and assets with an awareness of efficiency. We strive to invest in ways that enhance our competitive strength.

## 2.5. Our Responsibilities to Our Suppliers

We treat our suppliers fairly and respectfully and take the necessary care to fulfill our obligations on time. We carefully protect the confidential information of our suppliers.

## 2.6. Our Responsibilities to Our Competitors

We avoid unfair competition and support efforts to ensure a competitive environment.

## 2.7. Our Responsibilities to Society and Humanity

We act sensitively regarding social issues and strive to participate in services that benefit the public. We respect traditions and cultures. We do not give or accept bribes or gifts, products, or services that exceed the intended value.

## 3. POLICIES SUPPORTING BUSINESS ETHICS RULES

### 3.1. Conflict of Interest Policy

It is essential for Silvan Sanayi A.Ş. employees to avoid situations that may create conflicts of interest. The use of company resources, name, identity, and power for personal gain, as well as involvement in situations that could negatively affect the institution's name and image, are among the most important responsibilities of all employees.

The following implementation principles define the conflict of interest situations that company employees may encounter while performing their duties or in their private lives due to business relationships, as well as the principles to be applied in these situations.

Company employees are required to fully comply with the principles listed below as activities that may create conflicts of interest. The company undertakes the necessary efforts to encourage its employees to adhere to these principles.

### **Implementation Principles:**

#### **3.1.1. Engaging in Activities that May Create Conflicts of Interest**

Employees shall not enter into any business relationships that provide mutual or unilateral benefits with family members, friends, or other third parties involved. For example, an employee with purchasing authority should avoid doing business with a supplier where a family member is employed. Exceptions are subject to the knowledge and approval of the Company General Manager. Similarly, employees should be cautious of potential conflicts of interest arising from close family members working for company competitors.

Employees must not leak any company information to gain commercial advantage for themselves or others.

It is essential that employees do not engage, directly or indirectly, in work requiring them to be classified as a "merchant" or "tradesman," nor work, under any name, for another person or institution for compensation or similar benefits during or outside working hours.

#### **3.1.2. Abuse of Duty**

Employees shall not misuse their authority for personal or relatives' gain or in ways that cause harm to the company beyond the expected diligence.

Employees cannot gain personal profit directly or indirectly from the company's purchasing, sales activities, or any contracts and transactions the company is involved in.

Employees must not engage in actions or behaviors that violate ethics, laws, or company discipline.

#### **3.1.3. Use of Resources**

Company resources must be used considering the company's interests. Company assets, facilities, and human resources cannot be used outside the company for any purpose or benefit without company interest. The principle of "economy in all matters" applies to all employees.

During working hours, employees should manage their time efficiently and avoid attending to personal matters. Managers cannot assign employees to personal tasks.

### **3.1.4. Relations with Other Persons and/or Organizations in Commercial Relations with the Company**

Employees shall not enter into private business relationships with the company's customers, subcontractors, suppliers, or other persons and/or organizations with which the company has commercial relations. Personal borrowing or lending of money and/or goods/services with these parties is not allowed.

Employees cannot request or imply gifts from persons or organizations the company has commercial relations with; they cannot accept any gifts, money, checks, property, free vacations, special discounts, etc., that could create obligations for the company. No personal assistance or donations can be accepted from anyone or any organization doing business with the company.

### **3.1.5. Relations with the Media**

Giving statements to media outlets, participating in interviews, or speaking at seminars and conferences requires approval from senior management. No personal gain may be derived from these activities.

## **3.2. Gift Acceptance and Giving Policy**

It is essential that Silvan Sanayi A.Ş. and its employees do not accept gifts or benefits that could affect their impartiality, decisions, or behavior, nor offer such gifts or benefits to third parties that could create similar influences. The following principles regulate gift exchanges between company employees and third parties in business relations and set the applicable rules.

### **Implementation Principles:**

**3.2.1.** Employees are prohibited from accepting any gifts or benefits, whether of economic value or not, that affect or may affect their impartiality, performance, or decision-making during their duties.

**3.2.2.** Gifts or benefits explicitly or implicitly conditioned on a return favor are prohibited.

**3.2.3.** Valuable promotional gifts received during year-end or other periods are collected by the Human Resources Department under management supervision and distributed with management approval.

**3.2.4.** Offering, giving, or receiving bribes and/or commissions is absolutely forbidden.

**3.2.5.** Employees are prohibited from accepting money without compensation or as loans, or reimbursing travel, event expenses, and similar payments from subcontractors, suppliers, consultants, competitors, or customers.

**3.2.6.** Gifts and promotional materials to be given by the company to customers and other third parties in business relations must be approved by senior management. Once approved, no further permission is needed for distribution.

## **3.3. Information Security Policy**

- Ensure the confidentiality and integrity of Silvan Sanayi A.Ş. and its customers' information,
- Provide necessary infrastructure to guarantee the continuity of Silvan Sanayi A.Ş.'s processes,
- Implement physical and logical security measures appropriate to the value of the information held,
- Assign access rights according to the "need to know" principle to control information access,
- Prevent unauthorized access,

- Consider security needs during software development,
- Protect information assets against malware such as viruses and cyber-attacks from outside Silvan Sanayi A.Ş.,
- Develop an incident response process for information security events,
- Provide information security training to employees and increase awareness,
- Comply with laws and regulations,
- Ensure stakeholders comply with Silvan Sanayi A.Ş. Information Security Policies,
- Continuously improve the Information Security Management System.

**Implementation Principles:**

Information security, without being limited to these, includes all written, graphic, or machine-readable information related to our company such as trademarks and other intellectual property rights, any innovations, databases, printed communication materials, processes, advertising, product packaging and labels, plans (marketing, product, technical), business strategies, strategic partnerships and partner information, financial information, employee information, customer lists, product designs, know-how, specifications, identities of potential and actual customers, supplier information, and so forth.

The principles to be followed regarding information security are given below:

**3.3.1** This information cannot be disclosed to third parties unless disclosure is required by official authorities and legislation.

**3.3.2.** This information cannot be altered, copied, or destroyed. Necessary measures shall be taken to ensure careful handling, storage, and non-disclosure of the information.

**3.3.3.** Confidential files cannot be taken outside the institution. For confidential information that must be taken outside, approval must be obtained from the responsible person or senior management.

**3.3.4.** Passwords, user codes, and similar identifiers used to access company information must be kept confidential and not disclosed to anyone other than authorized users.

**3.3.5.** Company confidential information must not be discussed in public places such as dining halls, shuttle vehicles, or similar public areas.

**3.3.6.** When sharing information with third parties and/or organizations for company interests, a confidentiality agreement must be signed or a written confidentiality commitment must be obtained from the other party first to ensure their responsibility for the security and protection of the shared information

**3.3.7.** False statements and/or gossip about individuals or organizations are prohibited.

**3.3.8.** Information reflecting company policy that is personal to employees, such as wages, benefits, and similar personnel information, is confidential and must not be disclosed to anyone except authorized personnel. Employee information is sent in a personal manner. It is strictly forbidden for employees to disclose such information to others or to pressure other employees to disclose this information.

### **3.4. Policy for Creating and Maintaining a Fair Working Environment**

Silvan Sanayi A.Ş. considers the creation and maintenance of a fair working environment for its employees as one of its top priorities. The aim is to establish a fair, respectful to employees, healthy, and safe working environment in compliance with all relevant laws and regulations, thereby enhancing employee success, development, and loyalty. The following implementation principles define the fundamental rules for creating and maintaining a fair working environment within the company.

#### **Implementation Principles:**

**3.4.1.** Company practices comply with all relevant laws and regulations related to employment and working life. Employees also fulfill all legal requirements within their activities and act in accordance with legal regulations.

**3.4.2.** Silvan Sanayi A.Ş. ensures fairness in all practices including hiring, promotion, compensation, rewards, social rights, and other related applications.

**3.4.3.** Discrimination within the company based on language, race, color, gender, political opinion, belief, religion, sect, age, physical disability, or similar reasons is unacceptable.

**3.4.4.** A cooperative, positive, and harmonious working environment is created within the company to prevent conflict and ensure that individuals with different beliefs, opinions, and views work together harmoniously.

**3.4.5.** Employees' private lives and personal spaces are respected.

Communications between individuals cannot be violated by unrelated parties.

- Even if recorded legally, the unlawful sharing, dissemination, or obtaining of personal data by others is prohibited.
- Employee personal information, arising from the nature of the employment relationship and necessary for its continuation, cannot be used for other purposes and cannot be shared with third parties without the consent of the individual.
- The private and family lives of all employees are respected.

**3.4.6.** In addition to all forms of inviolability, employees' physical, sexual, and emotional integrity are protected.

**3.4.7.** No employee can demand preferential treatment or grant it to others based on differences in gender, religion, language, or race, nor can anyone be subjected to special treatment. It is unacceptable to give or receive concessions based on such differences.

**3.4.8.** The workplace's physical working environment and conditions are ensured to be healthy and safe for all employees.

**3.4.9.** Employees cannot be forced to work or made to stay for overtime against their will.

**3.4.10.** Original identity documents of employees cannot be kept or withheld; only photocopies are taken.

**3.4.11** Employees under the age of 18 are not allowed to work in the company. Apprentices or interns under 18 may be employed for educational purposes under a protocol between the school and employer.

## **4. EMPLOYEE RESPONSIBILITIES**

Procedures and Instructions have detailed ethical rules about how we should behave and perform our work. Compliance with these rules is the primary responsibility of all employees. Accordingly, all Silvan Sanayi A.Ş. employees are responsible for:

- Acting in accordance with laws and regulations under all circumstances,
- Reading, knowing, understanding, internalizing, and acting in compliance with the Silvan Sanayi A.Ş. Code of Ethics rules, principles, and values,
- Learning the general and job-related procedures and instructions valid for the company,
- Consulting their manager and Human Resources regarding potential violations related to themselves or others,
- Promptly reporting any possible violations by themselves or others; submitting reports either named or anonymously in written or verbal form to their manager, Human Resources, and/or the Ethics Committee,
- Cooperating with the Ethics Committee during ethical investigations and keeping investigation-related information confidential.

## 5. RESPONSIBILITIES OF MANAGERS

Managers at Silvan Sanayi A.Ş. have additional responsibilities beyond those defined for employees within the framework of ethical rules. Accordingly, managers are responsible for:

- Ensuring the creation and maintenance of a company culture and work environment that supports ethical rules,
- Setting an example through their behavior for the implementation of ethical rules and training their employees on these ethical rules,
- Supporting employees in submitting questions, complaints, and reports related to ethical rules,
- Providing guidance on necessary actions when consulted, taking all reports seriously, and forwarding them to the Ethics Committee as soon as possible when deemed necessary,
- Ensuring that the work processes under their responsibility are structured to minimize ethical risks and applying the necessary methods and approaches to ensure compliance with ethical rules.

## 6. OTHER RESPONSIBILITIES

- Senior management is responsible for the effective implementation of the ethical rules or company-specific Business Ethics Rules that they establish within this framework, and for creating a culture that supports this implementation.
- Business Ethics Rules and all related policies are revised and documented based on the recommendations of the Ethics Committee and announced with the approval of the General Manager.

In cooperation with the Ethics Committee, the company is responsible for:

- Ensuring the confidentiality of complaints and reports made within the framework of the Ethical Rules and protecting individuals after they make such reports,
- Ensuring the job security of employees who make reports,
- Guaranteeing that complaints and reports are investigated in a timely, fair, consistent, and sensitive manner, and taking necessary actions decisively as a result of violations.

## 7. DECLARATION OF ETHICAL PRINCIPLES

I have read and understood the 7-page **SİLVAN SANAYİ A.Ş. Code of Ethics and Working Principles**. I hereby accept and declare that I will act within the framework of all the rules stated in the Code of Ethics and Working Principles.

Name-Surname:

Date:

Signature:

REVISION NO	REVISION DATE	DESCRIPTION	PREPARED BY
0	24.01.2024	New Document	Yasemin KURTULDU
1	18.03.2025	The personnel definition has been changed to employee.	Onur SARPDAĞ