



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

CODE OF BUSINESS ETHICS AND WORK PRINCIPLES POLICY

1. OUR CODE OF BUSINESS ETHICS

1.1 Honesty

Honesty and integrity are our core values in all our business processes and relationships. We act with honesty and integrity in our interactions with employees and all stakeholders.

1.2 Confidentiality

Confidential information refers to data belonging to HABAŞ SINAİ ve TIBBİ GAZLAR İSTİHSAL END. A.Ş. that could create a competitive disadvantage, trade secrets, non-public financial and other information, personnel rights-related information, personal data of employees, customers, and stakeholders, as well as information we are obligated to protect under "confidentiality agreements" with third parties.

As employees of HABAŞ A.Ş., we take care to protect the confidentiality and personal information of our customers, employees, and other relevant individuals and organizations we work with.

We protect the confidential information related to the activities of HABAŞ A.Ş., use this information solely for the purposes of HABAŞ A.Ş., and share it only with authorized individuals within the designated scope.

Upon leaving the company, we will not take confidential information, documents, projects, regulations, or any related works that we have obtained due to our responsibilities outside the organization.

1.3 Conflict of Interest

As employees of HABAŞ A.Ş., we strive to avoid conflicts of interest. We do not seek personal gain through our position, nor do we benefit personally through our family or acquaintances in business relations. We do not engage in any external financial business activities outside of HABAŞ A.Ş. If a potential conflict of interest arises, we seek to resolve it through legal and ethical methods. In cases of doubt, we consult our Manager, the Human Resources Department, the Ethics Hotline, or the Ethics Committee.

2. Our Responsibilities

In addition to our legal responsibilities, we strive to fulfill the following responsibilities to our customers, colleagues, shareholders, suppliers and business partners, competitors, society, humanity, and on behalf of HABAŞ.

2.1 Legal Responsibilities

We conduct all our activities, both domestically and internationally, in compliance with the laws of the Republic of Turkey and international law. We provide accurate, complete, and understandable information to regulatory bodies in a timely manner. In all our activities, we maintain a neutral stance towards public institutions, administrative bodies, civil society organizations, and political parties, and we fulfill our obligations with this sense of responsibility, without expecting any benefits in return.



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

2.2 Our Responsibilities to Our Customers

We work with a proactive approach, focused on customer satisfaction, responding to our customers' needs and demands in the shortest time and most accurate way. We deliver our services on time and under the agreed conditions, and we approach our customers with respect, honor, fairness, equality, and courtesy.

2.3 Our Responsibilities to Our Employees

We ensure that employees' personal rights are used fully and correctly. We approach employees honestly and fairly, and we commit to providing a non-discriminatory, safe, and healthy work environment. We make efforts for the individual development of our employees, support them to voluntarily participate in appropriate social and community activities with a sense of social responsibility, and maintain a balance between work and private life.

2.4 Our Responsibilities to Our Shareholders

We prioritize the continuity of HABAŞ A.Ş. and create value for our shareholders by avoiding unnecessary or unmanageable risks and aiming for sustainable profitability. We act within the framework of financial discipline and accountability, managing the resources, assets, and working time of our company with efficiency and cost-saving awareness. We strive to enhance our competitive power and invest in areas with growth potential, ensuring the highest returns from allocated resources. We provide timely, accurate, complete, and understandable information regarding our financial statements, strategies, investments, and risk profile in our public disclosures and to our shareholders.

2.5 Our Responsibilities to Our Suppliers/Business Partners

We behave fairly and respectfully as we would expect from a good customer and take necessary care to fulfill our obligations on time. We carefully protect the confidential information of the people and organizations we work with and our business partners.

2.6 Our Responsibilities to Our Competitors

We compete effectively, but only in legal and ethical areas, and avoid unfair competition. We support efforts to establish a competitive structure in society.

2.7 Our Responsibilities to Society and Humanity

The protection of democracy, human rights, and the environment, as well as efforts related to education, charity work, and the elimination of crime and corruption, are of great importance to us. With a sense of being good citizens, we act sensitively and take a leading role in societal matters, participating in activities related to civil society organizations and public service. We are sensitive to the traditions and cultures of Turkey and the countries in which we conduct international projects. We do not offer or accept bribes, gifts, or products/services with excessive value that may have ulterior motives.



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

2.8 Our Responsibilities on Behalf of "HABAŞ"

Our business partners, customers, and other stakeholders trust us because of our professional competence and integrity. We strive to maintain this trust at the highest level.

We provide our services in accordance with Holding/Company policies, professional standards, the commitments we have made, and ethical rules, showing the necessary dedication to fulfill our obligations.

We make sure to offer services in areas where we believe we are professionally competent, aiming to work with customers, business partners, and employees who meet accuracy and legitimacy criteria. We do not work with those who harm public morality, the environment, or public health.

In public appearances, and when speaking in areas where listeners believe we are representing our Holding/Company, we express only the company's views, not our personal opinions.

In our relations with the media and on social media platforms, when expressing opinions related to our duties or personal preferences, we are aware that our views could be associated with our Holding/Company.

When we encounter complex situations that may put HABAŞ A.Ş. at risk, we first consult the appropriate personnel and follow the proper technical and administrative consultation procedures.

3. POLICIES SUPPORTING THE CODE OF BUSINESS ETHICS

3.1 Conflict of Interest Policy

It is essential for HABAŞ A.Ş. employees to avoid situations that could create conflicts of interest. Employees must not use the Holding/Company's resources, name, identity, or power for personal gain, and they should avoid situations that may negatively affect the company's reputation and image. The following guidelines define the situations where employees may encounter conflicts of interest while performing their duties or due to their business relationships and the principles that should be applied in such cases.

Implementation Principles

3.1.1 Activities that Could Create a Conflict of Interest

All employees of the Holding/Company must fully comply with the situations identified below as potential conflicts of interest and the principles outlined. The Holding/Company undertakes necessary efforts to encourage its employees to adhere to these principles.

3.1.2 Engaging in Activities that Could Create a Conflict of Interest

Employees must not engage in any business relationships that provide mutual or non-mutual benefits with their family members, friends, or other third parties. For example, an employee with purchasing authority should avoid doing business with a supplier where a family member works. Exceptional cases are subject to the knowledge and approval of the Chairman of the Holding/Company's Board of Directors. In the same manner, employees of the Holding/Company should also be cautious of potential conflicts of interest arising from their close family members working with competitors of the Holding/Company.



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite – Güven

HABAŞ A.Ş. employees must not work, under any title, for another person and/or institution in exchange for payment or similar benefits, either during or outside working hours. They should not engage in activities that would categorize them as "traders" or "artisans" through direct or indirect means. However, employees working for another person (family member, friend, or other third parties) and/or institution outside of working hours for payment or similar benefits is allowed under certain conditions.

- Not creating a conflict of interest with the duties and practices they carry out within the company,
- Not causing any inconsistency with other business ethics rules and the policies supporting them,
- Not negatively affecting their ability to continue performing their duties at the company,

These are possible only under the conditions of written approval by the Management, as specified below.

HABAŞ A.Ş. employees cannot hold board membership or auditing positions in companies outside the Group Companies without the approval of the Holding/Company's Board of Directors; they cannot take positions in competitor companies or companies with which the Holding/Company has business relations. In non-profit organizations and universities, employees can take part in social responsibility and charity-related roles with the written approval of management, as long as these duties do not interfere with their responsibilities within the Holding/Company.

Employees are free to speak on topics unrelated to the company and its activities and that do not contradict its policies, or to write professional articles. However, to use the name of the Holding/Company in these activities, approval must be obtained from the General Manager.

Managers cannot ask employees to engage in political activities or join a political party. Employees may voluntarily and individually participate in any political party's activities. If employees take part in any political party, they must pay attention to the following points:

- Employees' involvement in any political activity must not create a conflict of interest with the duties, practices, and approaches they maintain at the company.
- Employees cannot engage in any political activities during working hours, nor can they take up their colleagues' time with such activities.
- Employees cannot use the company name, their position or title within the company, or company resources during political activities.

Employees are free to make personal financial or moral contributions or donations to third parties outside the Holding/Company, and can take part in charitable associations. However, employees should avoid becoming members of any club, association, or cooperative by using the company name or their position within the company.



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

3.1.3 Misuse of Authority

It is unacceptable for employees to use their authority for their own or their close relatives' benefit, or to act outside the level of care expected from them, thus causing harm to the Holding/Company. Employees cannot directly or indirectly gain personal profit from the Holding/Company's purchasing and sales activities, or from any transactions and contracts the company is involved in. Employees are prohibited from engaging in actions or behaviors that are contrary to ethics, the law, and the Holding/Company's discipline.

3.1.4 Use of Resources

When using resources on behalf of the Holding/Company, the interests of the Holding/Company are taken into account. Holding/Company assets, facilities, and personnel cannot be used outside the company, under any name or for anyone's benefit, unless it serves the interests of the Holding/Company. The principle of "cost-effectiveness in all matters" is applied by all personnel.

The proper use of resources for the benefit of the Holding/Company also requires the proper use of time. During working hours, Holding/Company employees must manage their time effectively and must not dedicate time to personal tasks. Managers cannot assign employees to personal work.

It is essential that personal visitors are not accepted during working hours. Employees are required to complete meetings with necessary visitors within a reasonable time frame, ensuring the meeting is related to the visit's purpose and does not disrupt the workflow.

3.1.5 Commercial Relationship with the Holding/Company

Employees of the Holding/Company cannot engage in personal business relationships with the Holding/Company's customers, subcontractors, suppliers, or any other individuals or organizations with whom the Holding/Company has a commercial relationship. Personal loans or goods/services cannot be borrowed from them, and money, goods, or services cannot be lent to these individuals or organizations.

In customer relationships, even if it is to the customer's benefit, no transactions can be conducted without the customer's knowledge, no exploitation of customer weaknesses is allowed, and no profit can be made by providing incomplete or incorrect information to the customer.

Employees of the Holding/Company cannot request gifts from, or make any insinuations to, individuals or organizations with whom the Holding/Company has a commercial relationship. No gift, money, check, property, free vacation, special discounts, etc., that would place the Holding/Company under obligation can be accepted. No personal help or donations can be accepted from any individual or organization in a business relationship with the Holding/Company. The Gift Acceptance and Giving Policy applies in this regard.

3.1. Relations with the Media

Relations with the media are conducted within the framework of the Holding/Company Communication Procedure. Giving interviews to any media outlet, participating in seminars, conferences, etc., as a speaker is subject to the approval of the company's senior management. No personal profit can be gained from these activities in any way.



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

3.1.7 Representing the Company

Any fees obtained as part of duties carried out on behalf of the Holding/Company in associations, employers' unions, and similar non-governmental organizations must be donated to the relevant institution or channels directed by the institution. Payments made by third parties to the Holding/Company employee as a seminar speaker fee or in exchange for similar services are also donated to the relevant institution or channels indicated by the institution. These individuals may receive symbolic gifts, such as awards, plaques, etc., that hold no significant monetary value as souvenirs.

3.2 Gift Acceptance and Giving Policy

It is essential that HABAŞ A.Ş. employees do not accept gifts or benefits that could affect their impartiality, decisions, and actions, nor attempt to provide gifts or benefits to third parties or organizations that could create such influences. The following implementation principles regulate gift exchanges between Holding/Company employees and third parties or organizations with whom they have business relationships and establish the principles to be applied in this regard.

Implementation Principles

a) Holding/Company employees cannot accept any benefit or gift, whether of economic value or not, that could affect or is likely to affect their impartiality, performance, or decision-making while performing their duties.

b) Holding/Company employees:

- Should ensure alignment with the company's business objectives,
- Must comply with the applicable regulations,
- Employees may accept and/or give gifts, or agree to be subject to a special arrangement, provided that the gift will not put the Company in a difficult position if made public, and is within the framework outlined in paragraph c.

c) Provided that it is in accordance with the conditions specified in paragraph b above;

- Employees of the Holding/Company may give and receive entertainment, refreshments, and meals in acceptable standards of the business world, provided that they comply with the principles in the Holding/Company Authorities Table.

- At seminars and similar events attended on behalf of the Holding/Company, awards, plaques, or similar gifts with symbolic value, other than money, may be accepted as a token of the day.

d) Subject to the conditions specified in paragraph b above, other gifts, benefits, holidays, discounts, etc., and the total value of gifts received from each individual/organization in a calendar year, provided they are less than 500 TL, may be accepted without requiring approval.

e) Gifts or benefits that are directly or indirectly tied to a reciprocal exchange may not be accepted.



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

- d) Receiving, giving, or offering bribes and/or commissions is absolutely unacceptable under any circumstances..
- f) Holding/Company employees cannot accept money from subcontractors, suppliers, consultants, competitors, or customers without compensation or as a loan, nor can they have travel expenses, event costs, and similar payments covered.
- g) The gifts and promotional materials to be given to customers, dealers, and other third parties with whom the Holding/Company has a business relationship are approved by the Holding/Company senior management. Once approved, there is no need for additional permission for the distribution of these gifts and promotional materials.
- h) Subject to compliance with the conditions listed in item b above, the Holding/Company may accept suitable products and services as gifts, and with the knowledge and approval of the senior management, products or services that are appropriate for the recipient's culture and ethical values may be given as gifts.
- j) In exceptional cases where local cultural values require reciprocal gift-giving beyond the values defined in the company policy, these gifts may only be accepted on behalf of the Holding/Company and with the approval of senior management. In any case, the exchange of gifts must be done in a manner consistent with local culture.

3.3 Confidential Information Protection Policy

Information is one of the most important assets that HABAŞ A.Ş. will use to realize its vision. In this regard, the effective use of information, its proper sharing, and ensuring the confidentiality, integrity, and accessibility of this information is the shared responsibility of all our companies and employees. The following implementation principles define confidential information for the Holding/Companies and regulate the principles that employees must adhere to regarding confidential information.

Implementation Principles

Confidential information includes, but is not limited to, information that may create a competitive disadvantage for HABAŞ A.Ş., trade secrets, undisclosed financial and other information, personnel rights and benefits information, personal data of employees, customers, and stakeholders, and information protected under "non-disclosure agreements" with third parties.

The principles to be followed regarding confidential information are as follows:

- a) These information cannot be disclosed to third parties unless required by Official Authorities and Legislation.
- b) These information cannot be altered, copied, or destroyed. Necessary measures are taken to ensure that the information is carefully maintained, stored, and kept confidential. Any changes to the information are recorded along with their history.
- c) Confidential files cannot be taken outside the organization. For confidential information that needs to be taken outside the organization, the approval of the information owner or senior management must be obtained.



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

d) Passwords, user codes, and other identifying information used to access company data must be kept confidential and not disclosed to anyone other than authorized users.

e) Company confidential information should not be discussed in public spaces such as dining halls, cafeterias, elevators, shuttle buses, and similar areas. It must not be shared on social media accounts or mobile phone applications. On company social media accounts and mobile applications, confidential information can only be shared by authorized personnel within the scope and time permitted by company management.

f) Confidential information is classified according to its level of confidentiality, and this classification is clearly stated in the content of the information. Holding/Company employees are aware of the confidentiality levels of the information they obtain in the course of their duties and must act in accordance with these confidentiality levels. If there is any doubt regarding the confidentiality level, the employee must act according to the next higher level of confidentiality, and if necessary, seek the opinion of the relevant manager.

g) If information needs to be shared with third parties or organizations for the benefit of the Holding/Company, a confidentiality agreement must first be signed or a written confidentiality commitment must be obtained from the other party to ensure their understanding of the responsibility for the security and protection of the shared information.

h) Personnel-related information, such as salary, benefits, and other personal information that reflects company policy and is specific to the individual, is confidential and cannot be disclosed to anyone other than authorized personnel.

Personnel-related information is sent individually and privately. Employees cannot disclose this information to others or pressure other employees to disclose it.

j) Compliance with the regulations regarding the protection of personal data is ensured.

k) The ethical obligations related to confidentiality, as stated above, continue to apply even after an employee has left the company for any reason.

3.4 Fair Working Environment Creation and Maintenance Policy

HABAŞ A.Ş. considers the creation and maintenance of a fair working environment for employees as one of its top priorities. The aim is to foster a fair, respectful, healthy, and safe working environment in compliance with all relevant laws and regulations, thereby enhancing employee success, development, and commitment. The following application principles establish the core guidelines for creating and maintaining a fair working environment in Holding/Companies.

Application Principles

a) Holding/Company practices comply with all applicable laws and regulations regarding employment and working life. Holding/Company employees also fulfill all legal requirements within the scope of their activities and act in accordance with legal regulations.

b) HABAŞ A.Ş. ensures that all practices, including recruitment, promotions, transfers, rotations, compensation, rewards, social benefits, and other related applications, are fair.



HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ A.Ş

Hizmet - Kalite – Güven

c) Discrimination among employees within the organization based on language, race, color, gender, political beliefs, religion, sect, age, physical disability, or similar reasons is unacceptable.

d) A collaborative, positive, and harmonious working environment is created within the company, and conflict situations are prevented, ensuring that individuals with different beliefs, thoughts, and opinions work together in harmony.

e) Employees' private lives and personal spaces are respected.

f) In addition to the inviolability of employees, their physical, sexual, and emotional inviolability is also safeguarded.

• It is against the law and ethical standards to violate the inviolability of individuals through physical, sexual, and/or emotional harassment at the workplace or any location related to work, and the Holding/Company does not tolerate this crime under any circumstances. In this regard, every necessary measure will be taken to ensure that employees work in an environment where their physical, sexual, and emotional inviolability is protected.

• Any violation of a person's bodily inviolability and/or harassment for sexual purposes without physical contact is defined as sexual assault/harassment. Therefore, any behavior that falls under this definition is unacceptable.

• "Workplace Psychological Harassment" (Mobbing), which involves one or more persons intentionally carrying out malicious, deliberate, negative attitudes and behaviors that aim to intimidate, neutralize, or force someone out of work, and which systematically continues over a period, causing harm to the victim's personality, professional situation, social relationships, or health, is also considered a form of harassment as mentioned above.g) İşyeri fiziksel çalışma ortamı ve şartlarının tüm çalışanlar için sağlıklı ve güvenli olması sağlanır.

h) HABAŞ A.Ş. takes a leading and responsible approach to ensure that the core activities it conducts do not have adverse effects on the environment. The company acts with sensitivity towards its responsibilities to society and humanity, and takes all necessary measures as required by the relevant regulations. It also works to raise awareness and sensitivity among employees on these matters.

4. EMPLOYEE RESPONSIBILITIES

The relevant policies and procedures outline in detail the ethical rules regarding how we should behave and how we should perform our work. Adherence to these rules is the primary responsibility of all employees.

In this regard, HABAŞ A.Ş. employees are expected to:

- Always act in compliance with laws and regulations,
- Read the HABAŞ A.Ş. Code of Ethics, be aware of, understand, internalize, and act in accordance with the rules, principles, and values it contains,
- Learn the general policies and procedures applicable to the Holding/Company and those related to their work,
- Consult with their manager and human resources regarding potential violations concerning themselves or others.



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

- Report any potential violations of themselves or others immediately; provide their notifications, preferably based on reliable sources, information, and documentation, to their manager or human resources in writing or orally, either with their name or anonymously,
- Follow the "Ethical Decision-Making Guidelines and Procedures" established to assist in acting in accordance with the rules and solving problems,
- Cooperate with the Ethics Committee in ethical investigations, and maintain the responsibility of keeping investigation-related information confidential.

4.1 Ethical Decision-Making Guidelines and Procedures

When deciding on an action plan, you should follow the steps below and ask yourself the following questions:

4.1.1 Identifying the Event, Decision, or Problem

- Were you asked to do something that you believe could be wrong?
- Are you aware of a situation in the Holding/Company or with your business partners that could potentially be illegal or not in compliance with business ethics?
- Are you trying to make a decision and have doubts about how to act in accordance with business ethics?

4.1.2 Think Before Making a Decision

- Try to clearly identify and summarize the problem or your question.
- Ask yourself why this is a dilemma.
- Consider the options, their outcomes, and who might be affected.

• Consult with others.

4.1.3 Make a Decision on an Action Plan

- Identify your responsibilities
- Review all relevant facts and information
- Refer to the appropriate company policies, procedures, and professional standards
- Assess the risks and think about how you can mitigate them
- Try to develop the best action plan
- Consult with others



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

4.1.4 Test Your Decision

- Review the ethical questions that should be asked
- Reassess your decisions within the framework of the company's core values
- Ensure that you have considered company policies, laws, and professional standards
- Consult with others and incorporate their feedback into your planned action plan

4.1.5 Move Forward with Determination

- Share your decision with the relevant individuals along with your reasoning
- Share what you have learned and your success stories with others

4.2 Four Key Questions to Consider

a) Is this activity/behavior in compliance with laws, rules, and customs? (Standards)

- Is it in accordance with professional standards?
- Is it in compliance with the laws?

b) b) Is this activity/behavior balanced and fair? Would we be uncomfortable if a competitor (someone else) did it? (Sense of Justice)

- Is it right in your opinion?

c) Would our company and stakeholders be uncomfortable if all the details of this activity were made public? (Feelings and Ethical Values)

- If others knew you engaged in this behavior, would you feel uncomfortable or embarrassed?
- Could this lead to negative consequences for you or your company?
- Who else could be affected by this (other employees within the company, you, shareholders, etc.)?

d) • How much does the "perceived reality" align with the "objective reality"?

- How would it be portrayed in the media?
- What would a reasonable person think in the same situation?

5. MANAGERS' RESPONSIBILITIES

HABAŞ A.Ş. managers have additional responsibilities beyond the defined responsibilities for employees within the framework of the established rules. Accordingly, managers are responsible for:

- Ensuring the creation and maintenance of a company culture and work environment that supports ethical rules.
 - Being a role model through their behavior in the application of ethical rules,



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite – Güven

- Educating their employees about ethical rules,
- Supporting their employees in conveying questions, complaints, and reports related to ethical rules,
- Providing guidance when consulted on what actions to take, considering all reports, and forwarding them to Human Resources as quickly as necessary,
- Ensuring that the business processes under their responsibility are structured to minimize risks related to ethical issues and applying necessary methods and approaches to ensure compliance with ethical rules.

6. RESPONSIBILITIES OF ETHICAL RULE CONSULTANTS

Ethical Rule Consultants are responsible for:

Providing guidance and consultancy on ethical questions and issues raised by employees within the company,

Contributing to the resolution of internal ethical violations and forwarding unresolved issues to the Ethical Committee,

Regularly or upon request, reporting ethical questions and violations, along with their outcomes, to the Ethical Committee,

Acting as the point of contact within the company for the Ethical Committee's investigations and providing necessary support during inquiries,

Monitoring and following up on the effectiveness of ethical practices within the company and supporting the implementation of these practices.

7. OTHER RESPONSIBILITIES

- The Business Ethics Rules and all related policies are reviewed by Human Resources with suggestions from top management, revised, documented, and announced after receiving approval from top management.

Holding/Company Human Resources:

- Ensuring that employees are informed about the Ethics Rules, providing periodic training to ensure the clarity of policies and rules, and maintaining continuous communication with employees on this matter,
- Ensuring that new hires read and are informed about the ethics rules in the company,
- Collaborating with the Ethics Committee in cooperation with the company's management;
- Guaranteeing the confidentiality of complaints and reports made under the framework of the Ethics Rules and protecting individuals after the reports,
- Ensuring job security for employees who make reports,



**HABAŞ SINAİ VE TIBBİ GAZLAR İSTİHSAL ENDÜSTRİSİ
A.Ş**

Hizmet - Kalite - Güven

- They are responsible for ensuring that complaints and reports are investigated in a timely, fair, consistent, and sensitive manner, and for taking decisive action in response to violations.

8. REPORTING AND RESOLUTION OF ETHICAL CODE VIOLATIONS

Employees who learn of violations of the Company's Code of Ethics or applicable legal regulations should first report it to their immediate managers. If the issue concerns their direct supervisor, the Ethics Rule Consultant, the Company's Ethics Hotline, and/or the CEO/General Manager should be notified. If no action is taken or results are achieved, the matter should be reported to the Company's Ethics Committee.

If the violation involves the company's senior management, it must be reported directly to the Board of Directors. Notifications made to the company will be concluded and resolved according to the company's internal procedures. In significant cases or when deemed necessary, senior management will be informed, and their opinion will be sought.

Individuals who violate the Code of Ethics or the Company's policies and procedures may face disciplinary actions, which could range from reprimands to termination. Disciplinary actions will also be applied to those who approve, direct, or are aware of inappropriate behavior or violations but fail to report them appropriately. Furthermore, individuals who exhibit negative behavior or retaliation against those who report complaints or assist during investigations will also not be tolerated.

False or defamatory reports made with intent to deceive are considered violations of ethical rules. In cases where falsehood or defamation occurs, the Company or employee being defamed has the right to take legal action under the Turkish Penal Code, the Labor Law, and the Code of Obligations, among other relevant regulations.

8.1 Ethics Committee

The Ethics Committee is established under the Habaş A.Ş. Code of Business Ethics to resolve conflicts of interest, assess notifications regarding violations of ethical rules, and provide recommendations on the procedures, methods, and actions to be followed in cases of ethical violations. The Ethics Committee consists of the following members:

- Chairman – Habaş A.Ş. Factory Manager
- Member – Habaş A.Ş. Lawyer
- Member – Habaş A.Ş. Personnel Chief
- Member – Human Resources Manager

8.1. Ethics Committee Working Principles

The Ethics Committee conducts its activities within the framework of the following principles:

It maintains the confidentiality of notifications, complaints, and the identities of the individuals making the notifications or complaints.

Everyone who makes a notification to the Ethics Committee is under the protection of the Ethics Committee, and no pressure, discrimination, or mobbing can be applied to them.

The Ethics Committee conducts investigations within the boundaries of confidentiality as much as possible.

The Ethics Committee has the authority to directly request information, documents, and evidence from the relevant department. Any information and documents obtained can only be reviewed in relation to the investigation at hand.

The investigation process is documented from the beginning in a written report. Information, evidence, and documents are attached to this report. The report is signed by the chairman and members.

The investigation is handled urgently, and efforts are made to reach a conclusion as quickly as possible. Decisions made by the committee are immediately implemented.

The relevant departments and authorities are informed about the results.

The chairman and members of the committee carry out their duties independently of their department managers and the hierarchy within the organization. They must act without being influenced by anyone and cannot be pressured or influenced regarding the matter at hand.

If necessary, the committee may consult with experts and take appropriate measures during the investigation, without violating confidentiality principles.

For any questions or notifications, you may use the email addresses below or contact the members of the Ethics Committee directly.

Email:AAetikiibar@habas.com.tr

Phone:232-6251170

Working hours:

- Weekdays: 08:30 AM - 05:30 PM
- Saturday: 08:30 AM - 01:00 PM

The logo for HABAS, featuring the word "HABAS" in large, bold, red capital letters. The letters are set against a white, horizontal, pill-shaped background that is centered within a larger, light purple rectangular area.