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ŞİMŞEK AMBALAJ

CODE OF ETHICS AND WORKING PRINCIPLES

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Şimşek Ambalaj expects any supplier and customer it enters into a business relationship with, to adhere to and comply with the ethical rules it will publish and follow. These ethical rules are considered as an integral part of the employment contract for its employees, and Şimşek Ambalaj takes the responsibility to ensure that its employees strictly comply with them.

Şimşek Ambalaj aims to be recognized as a responsible company whose actions are consistent with the requirements of international standards. Therefore, it expects all companies and individuals it works with, to comply with these ethical rules.

The principles outlined in this Code of Ethics and Working Principles are based on important international agreements, such as the 10 principles of the UN Global Compact, the fundamental and priority conventions of the International Labour Organization, as well as declarations on human rights and protection.

These Ethics Rules and Working Principles apply to all stakeholders of Şimşek Ambalaj.

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1. Code of Business Ethics

1.1. Honesty, Integrity and Transparency

Honesty, integrity, and transparency are fundamental principles for Şimşek Ambalaj. By adhering to these principles, Şimşek Ambalaj preserves and reflects its image, reputation, and integrity in all areas of operation.

All internal, external, and public disclosures must adhere to the principles of accuracy and honesty.

Şimşek Ambalaj embraces values of honesty, integrity, transparency, and business ethics in all its activities, avoiding any behavior that could undermine mutual trust. It expects the parties involved in its business relationships to share the same values and act accordingly. Business relationships are built on mutual trust, and transparency is maintained throughout all processes.

1.2. Confidentiality

Confidential information owned by Şimşek Ambalaj includes undisclosed financial, strategic, technical, commercial information, data regarding personnel privacy rights, third-party information covered by confidentiality agreements, and similar information that, if known, could cause harm to the company and/or stakeholders.

The following information, not disclosed to the public by Şimşek Ambalaj, is considered confidential:

- Employee information, inventions, contracts, strategic plans, and business plans, significant management changes, new launched products, mergers and acquisitions, technical specifications, pricing, offers, financial data, product costs;
- Information belonging to third parties with whom business relations are established, not publicly disclosed details, software, technical information, materials, records, files, documents, programs, reports, notices, announcements, reviews, data, customer lists, trade secrets and similar information are confidential information.
- Contracts signed with our commercial partners, all kinds of documents sent to us as special records, all kinds of samples sent by our customers within the scope of Confidentiality agreement are considered and treated as confidential information.

Our employees are expected to protect the aforementioned confidential information and use it only for the company's purposes.

Şimşek Ambalaj employees ensure protection of all information that belongs to Şimşek Ambalaj and to its stakeholders and while carrying out their duties, they securely maintain and keep confidential the information and professional secrets they have been provided about our employees, customers, suppliers and our company, in accordance with the Confidentiality agreements, and share this information with the relevant persons only within the specified authorization limits.

They cannot share confidential information with third parties when leaving our company and they are obliged to return all kinds of confidential documents or electronic copies they have obtained during the period they have worked. In addition, Confidentiality agreements have been signed with our company employees and they are aware of their responsibilities that arise in line with this contract. Our company has a Personal Data Protection Policy (KVKK) and procedure in place, and all personnel have received training on this matter.

1.3. Human rights

Şimşek Ambalaj follows the current legislation by complying with both the Turkish Labor Law legislation, the ILO Convention and other laws, and believes in and supports the rights and freedoms of individuals whenever and wherever it operates.

Şimşek Ambalaj complies with the "International Labor Rules" and adopts the working age rules in line with local laws wherever it operates in this direction.

Accordingly, under no circumstances discrimination based on the ethnic origin, gender, color, race, nationality, economic status, disability, age, religion and other beliefs of individuals, is allowed. This rule also applies to recruitment and promotion, working conditions, and all relationships with customers, suppliers and partners.

Şimşek Ambalaj employees are free to take part in activities in non-governmental organizations, public benefit services, associations, foundations and similar institutions, taking into account their working time, sense of duty and responsibility. In addition, Şimşek Ambalaj respects the right of its employees to organize.

1.4. Legality

Şimşek Ambalaj and its employees are obliged to comply with the local laws of the countries where they operate, as well as international legal rules. Şimşek Ambalaj is responsible for providing accurate and understandable information to official institutions and organizations in a timely manner.

Employees are not allowed to engage in unlawful activities for the benefit of the company or personal interests.

Procedures in transactions with public authorities are subject to special legal rules and may be different than the transactions with the private sector. Employees ought to know and understand these rules, and in case of any doubt, they are required to consult the Company's Legal Counsel.

1.5. Our human rights practices

We ensure that our employees exercise their personal rights fully and correctly. We treat our employees honestly and fairly, and we are committed to a non-discriminatory, safe and healthy working environment. We make the necessary efforts for the individual development of our employees, support them to volunteer for appropriate social and community activities with a sense of social responsibility, and make sure to maintain a balance between business life and private life.

1.5.1. Establishing and maintaining fair and safe working environment

- Company practices comply with all applicable laws and regulations regarding employment and working life. Company employees also fulfill all legal requirements while carrying out their activities and act in accordance with legal regulations.
- Şimşek Ambalaj human resources policies and practices, ensure that all practices in the company, regarding recruitment, promotion-transfer-rotation, remuneration, benefits, training, etc. are fair.
- Discrimination among employees within the organization on the basis of language, race, color, gender, political opinion, belief, religion, sect, age, physical disability, etc. is unacceptable.

- A positive and harmonious working environment that supports cooperation is created in the company, and people with different beliefs, thoughts and opinions are ensured to work in harmony. Religious propaganda cannot be carried out in the workplace environment.
- It is ensured that the physical working environment and conditions of the workplace are healthy and safe for all employees.
- Managers are prohibited from entering into a debt-credit relationship with employees.

1.5.2. Respect and confidentiality of private life at workplace

- Şimşek Ambalaj employees act openly, respectfully, honestly, with a sense of responsibility and within the framework of courtesy rules while sharing their thoughts and opinions with each other.
- The private and family life and personal spaces of all employees are respected.
- No verbal, written and electronic communication between persons can be recorded, shared with others and/or published without their prior consent. Even if this communication is recorded in accordance with the law, it is forbidden to disseminate and use these records for any other purpose.
- Personnel information arising from the nature of the business relationship in the workplace, which may be required to be used afterwards, cannot be used for any reason other than the intended purpose of use and cannot be shared with 3rd parties without the consent of that person.

1.5.3. Harassment and Psychological Harassing (Mobbing) (Mobbing)

- Violation of privacy of our stakeholders with whom we have a business relationship, by our employees, by means of physical, sexual and/or emotional harassment in the workplace or in any place where they are due to work, is not tolerated. Possible negative attitudes and behaviors towards people who report such violations or assist the investigation of the matter, are considered as violations of our code of ethics.
- Systematic and planned behaviors that aim to alienate the targeted person from the job, reduce their performance, and cause them to resign are not tolerated and considered as psychological harassment (mobbing).

1.5.4. No Child Labor

Our business partners cannot employ people who have not reached the minimum age required by law in any country in which they operate. If the minimum age has not been established by law, they must comply with the 138th and 182nd provisions of ILO Conventions in this regard. Therefore, they are required to verify the age of their employees through possible legal means. The age limit is also determined according to the difficulty of the job. Persons under the age of 18 should not engage in night work, hazardous work, or activities that may harm their physical or mental health.

In this context, only apprentices and trainees are employed in Şimşek Ambalaj in accordance with the relevant laws, and no one under the age of 18 is recruited.

1.5.5. Prohibition of Forced Labor

In Republic of Turkey, no citizen can be forced to work illegally. This is clearly stated in 18th Article of the Turkish Constitution (No one can be forced to work. angary is prohibited). Our business partners and all stakeholders are also obliged to comply with this rule. Our business partners cannot be involved with or benefit from any form of human trafficking or slavery, and they must also comply with the provisions of 29th provision of ILO Convention.

1.5.6. Fair pay

Şimşek Ambalaj respects the right of employees to receive a fair wage sufficient to provide a good standard of living for themselves and their families. Employees must be paid the wage they deserve, which cannot be lower than the minimum wage set by countries. In addition, the employee's wage must be paid regularly and in full. Şimşek Ambalaj pays its entire staff a full wage.

1.5.7. Working hours

Our business partners ensure that their employees benefit from working hours and leave days in accordance with the laws and regulatory provisions of the country where they operate. Overtime should be optional, paid at a higher rate and should be inline with the status of the relevant employees, and should not pose a professional risk to the employee in accordance with local regulations. Şimşek Ambalaj also complies with these rules, ensuring humane working conditions within the limits set by the Labor Law and providing a working life to its employees.

1.5.8. Ensuring Diversity

We are aware of the importance of diversity in our company. For this reason, we employ people with disabilities and others who require special attention. We also encourage diversity in our business partners' companies and urge them to take measures to promote the integration and maintenance of people with challenging conditions or disabilities.

1.6. Quality and Continuous Improvement

With its quality, service, technology and price, Şimşek Ambalaj works with the aim of being the leading supplier and business partner in the metal packaging industry. One of the most important priorities of Şimşek Ambalaj is to meet the needs of the customer and to ensure full customer satisfaction. For this reason, all employees, including the Board of Directors, fulfill all kinds of duties that they are required to carry out.

1.7. Adherence to the Principle of Disposition

Şimşek Ambalaj adopts the principle of preventing waste in the use of resources and paying attention to savings in the activities and projects it carries out. This principle is taken into account in adopting decisions regarding the business and in the carried out internal audits.

Likewise, our employees make sure that they utilize the financial resources of their organizations economically and efficiently, just like with the same way they handle their own family budgets. Each Şimşek Ambalaj employee is aware of the fact that this type of behavior, which is adopted as a common corporate principle, will give their companies a competitive advantage.

1.8. Competition

As Şimşek Ambalaj, we compete effectively only in legal and ethical areas and avoid unfair competition.

We support efforts that shall help us establish the targeted competitive structure in the society.

1.9. Environment, Health and Safety

Şimşek Ambalaj is a company that respects society and the environment, fulfills all obligations imposed by legal regulations, in a complete and flawless manner, and complies with relevant standards and rules. Our goal as Şimşek Ambalaj is to minimize the negative effects of our metal packaging production on occupational health, safety, and the environment by making safe and protective process investments.

1.10. Respecting the Right to Organization and the Right to Establish Trade Unions

Our business partners are committed to respecting the right of their employees to organize and the right to carry out trade union activities within the scope of applicable national and international legislation and regulations. Our partners care to maintain a collaborative attitude in their relations with their employees and to prevent conflicts through effective and continuous social dialogue. As Şimşek Ambalaj, we comply with these obligations.

1.11. Fighting Against Corruption and Money Laundering

Our business partners fight against all forms of corruption in every country where they operate.

Şimşek Ambalaj will not directly or indirectly offer, promise, give or promise to make illegal payments or other unduly payments. They will not confer a benefit on public authorities to be granted or maintain a granted contract or any other improper advantage. In particular, they will refrain from any kind of extortion of money, fraud or bribery.



1.12. Respecting Intellectual Property Rights

In accordance with the relevant agreements and legislation, Şimşek Ambalaj respects Intellectual Property Rights of its business partners and refrain from using their names, trademarks and protected designs unless there is a special agreement and ensures to prevent any illegal transaction.

Şimşek Ambalaj also wants its business partners to respect Intellectual Property Rights of their own company as well as of the companies it carries out production for and supplies to, and to protect their legal rights.

2. OUR RELATIONS WITH STAKEHOLDERS

2.1. Protecting Şimşek Ambalaj's reputation

Our employees provide their services within the framework of company policies, professional standards, commitments made, and ethical rules, showing the necessary dedication to fulfill their obligations. Outside of Şimşek Ambalaj, in areas where the Şimşek Ambalaj brand is represented, Şimşek Ambalaj employees express not their personal views but the company's views. Therefore, Şimşek Ambalaj employees do not share information and opinions with the public except for making corporate statements. Only authorized Şimşek Ambalaj employees can represent Şimşek Ambalaj to the public in matters and issues they are authorized for.

2.2. Protecting Assets and Resources of Şimşek Ambalaj

Şimşek Ambalaj employees ensure the protection of assets of Şimşek Ambalaj such as brandname, reputation, intellectual capital (information assets), trade secrets, and other technical information and fulfills the requirements of the executed protocols and KVKK. Şimşek Ambalaj the rights of others in the same way it protects its own its rights and, avoids working with those who may harm such values and assets, and violate ethical rules, risk environmental and public health.

The company ensures that its assets/resources are used efficiently within working hours and all assets of the company are used for business purposes only.

Information is one of the most critical asset categories, and all employees must comply with Confidentiality instructions to ensure the appropriate protection of information assets.

2.3. Conflict of interest

Conflict of interest is a situation in which a person or entity has the potential to gain personal or corporate benefits by improperly exploiting their status.

Şimşek Ambalaj aims to avoid situations that may create conflict of interest in its business-related activities.



2.4. Combating Anti-Competitive Practices

Our business partners take all possible measures to avoid anti-competitive practices. They undertake not to make agreements and/or abuse their dominant position. They refrain from sharing any sensitive information (customer lists, marketing plans, business strategies, purchase and sale prices, etc.) with third parties and especially with competitors of Şimşek Ambalaj. They are also required to familiarize themselves with the legislation and regulatory provisions related to competition in the countries in which they operate and, if necessary, to consult an expert in the field. Şimşek Ambalaj also complies with this obligation.

2.5. Giving and Taking Gifts

Gifts cannot be accepted by Şimşek Ambalaj employees under any circumstances, except than the ones which with no doubt that have symbolic value, from our customers, companies that have or are likely to have a business relationship with the employer. Giving, receiving or offering bribes / commissions by our employees is not accepted under any circumstances. This issue is contracted by the personnel regulations.

2.6. Relations with Employees

We ensure that our employees exercise their personal rights fully and correctly. Regardless of the subordinate-superior relationship, human values are observed in our behaviors and speeches, and personal insults, humiliating words and behaviors are avoided. We make the necessary efforts for the individual development of our employees, treat them honestly and fairly, and commit to a non-discriminatory, safe and healthy working environment.

2.6.1. Procedures for Reporting Nonconformities

Business partners and employees may wish to report to Şimşek Ambalaj, any non-compliance or behaviors they believe to be inconsistent with the ethical principles outlined in these codes. Parties can communicate the same to each other and notify the same by email to department managers and when deem necessary, ask for correction within a certain period of time.

2.6.2. Doing Business with Resigned Employees

For former Şimşek Ambalaj employees to be able to do business with Şimşek Ambalaj, as a salesman, contractor, consultant, broker, representative, dealer, etc. the following conditions must be met:

- They should not have any disciplinary record in the company where they previously worked,
- There should not have been any conflict of interest arising from their previous position.



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2.7. Relationships with Customers and Suppliers

We work with a proactive approach that focuses on customer satisfaction and responds to the needs and demands of our customers in the shortest time and in the most accurate way. We provide our services on time and under the terms we promise; we approach our customers with respect, honor, justice, equality and courtesy. We carefully protect our customers' confidential information.

We treat all our suppliers fairly and respectfully, as expected from a good customer, and we take the necessary care to fulfill our obligations on time. We carefully protect the confidential information of the people and organizations we do business with and our business partners.

2.7.1. Right to Inspect

Şimşek Ambalaj reserves the right to inspect its business partners at any time, in order to verify their compliance with the Commercial Relations Ethics and Business Principles and Rules. It is strongly recommended to the Partners to periodically evaluate their compliance with the Code of Conduct for Business Relations with respect to their employees and their business partners, by any means they deem appropriate. In this context, our company may inspect our business partners, in accordance with the mentioned procedures and rules.

2.8. Relationships with Society

Protection of democracy, human rights and the environment, social responsibility works, the elimination of crime and corruption are very important to us. With the awareness of being a good citizen, we act sensitively as a pioneer in social issues. We hold traditions and cultures of our business partners dear.

We act in accordance with the Labor Law and the International Labor Organization (ILO) agreements to which the Republic of Turkey is a party, regarding the prevention of child labor, and we ensure that our suppliers comply with the said legislation.

We are included in intern and apprentice training programs as stipulated by the legal regulations and aim to train individuals who are beneficial to the society.

As Şimşek Ambalaj, we have chosen to work in accordance with the principles of "sustainability" in line with ethical rules and working principles. In addition to these principles, the understanding of sustainable development also includes the principles of efficient and profitable work and planning for the future. Şimşek Ambalaj plans its responsibilities towards the society within the framework of the principles of "sustainability" and carries out its contributions to the society within the framework of its social responsibility approach.

İşbu belge tarafımdan aslına uygun olarak Türkçe'den İngilizce'ye tercüme edilmiştir. (This document is translated from Turkish to English by me in accordance with its true copy)

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