1. Ferro Döküm Ethical Working Principles and Rules
1. 1. Purpose and Scope
1.2. Ethical Values and Principles
1.3. Notification and Resolution of Non-Compliance with Ethical Rules
1.3.1. Ethical Violation Notification
1.4. Ethics Committee
1.4.1. Ethics Committee Working Principles
1.5. Training and Awareness
1.6. Monitoring and Reporting
2. Ethical Working Principles and Rules
2.1. Activities That May Create Conflict of Interest
2.2. Abuse of Office
2.3. Use of Resources
2.4. Relations with Other Persons and/or Organizations with Which the Company Has Commercial Relations
2.4.1. Principles of Ethical Behavior in Commercial Relations
2.4.2. Supplier and Stakeholder Management Principles
2.5. Media Relations
2.6. Representation of the Company
2.7. Gift Acceptance and Giving Policy
2.7.1 Application Principles
2.8. Protection of Confidential Information Policy
2.8.1 Application Principles
2.9. Creation and Maintenance of Fair Working Environment Policy
2.9.1 Application Principles
2.10. Payments and Protection of Rights
2.11. Ensuring Regular Employment and Compliance with Working Hours
2.12. Granting the Right to Expression and Unity
3. Responsibilities
3.1. Employee Responsibilities
3.1.1. Procedures and Methods to be Followed in Making Ethical Decisions
3.1.2. 4 Basic Questions to Consider
3.2. Responsibilities of Managers
3.3. Responsibilities of Ethics Committee Members and Others
3.3.1. Ethics Committee Members
3.3.2. Senior Management of the Company
3.3.3. Human Resources Department of the Company
3.3.4. Company Management in Cooperation with the Ethics Committee;

1. Ferro Döküm Ethical Working Principles and Rules

Ferro Döküm San. ve Dış Tic. A.Ş aims to provide customer satisfaction in providing its products and services of universal quality and standards by using scarce natural resources effectively and also to contribute to economic and social development.

In this way, the company aims to be a symbol of reliability, continuity and respect for its customers, shareholders, employees, suppliers, dealers and authorized services, in short, all its stakeholders, nationally and globally.

- Our customers are our benefactors,

- Always being the best is our indispensable goal,

- Our most important capital is our human resources,

- Our aim is to create resources for continuous development,

- We aim to add strength to the country's economy from which we draw our strength,

- It is our principle to comply with superior business ethics and honest working principles,

Ferro Döküm San. ve Dış Tic. A.Ş., which bases itself on these principles, aims to guide its employees and those acting on behalf of Ferro Döküm in the decisions they will make and the behaviors they will display while performing their duties with the Ethical Conduct Rules.

It covers all Ferro Döküm employees, including the Ferro Döküm San. ve Dış Tic. A.Ş. Management.

All Ferro Döküm employees are expected to exhibit attitudes and behaviors that will ensure the cultural integrity of the group.

In addition, what is expected from all employees is to protect and develop their reputation and the reliability of the Group's corporate structure. All employees employed within the Group, including temporary personnel, are obliged to comply with the Group Ethical Conduct Rules or the Company Ethical Conduct Rules established in accordance with it.

All stakeholders are expected to comply with the business ethics rules and all application principles supporting these rules. Informing all employees of the Code of Ethics, ensuring that employees attach the necessary importance to these rules, and demonstrating the necessary effort and leadership to comply with the Code of Ethics are among the primary duties and responsibilities of middle and senior managers working in the Group. The responsibility for documenting that the latest version of the Code of Ethics and Implementation Principles document has been read, understood, and committed to its implementation belongs to the employee's immediate superior.

1. 1. Purpose and Scope

This Code of Ethics Procedure aims to encourage ethical behavior by our company's employees and managers, to ensure compliance with our ethical rules and values, and to report ethical violations. The procedure applies to all employees and managers.

1.2. Ethical Values and Principles

Our company is committed to the following basic ethical values and principles:

Honesty and Business Ethics: Every employee must be honest, fair, and law-abiding.

Confidentiality: The confidentiality of internal company information, customer data, and employee information must be protected.

Conflict of Interest: Employees must avoid conflicts between their personal interests and the interests of the company.

Environmental and Social Responsibility: Our company is committed to fulfilling its environmental and social responsibility.

1.3. Notification and Resolution of Non-Compliance with the Code of Ethics

If employees learn that the Company's Code of Business Ethics or the legal regulations to which the Company is subject have been violated, they are obliged to first report this to their direct managers, if the situation is directly related to the manager they are directly related to, to the Company Ethics Reporting Line and/or if no steps are taken regarding the incident and no result is obtained, to the Company Ethics Committee. If the violation is related to the Company's senior management, the issue should be reported directly to the Company Ethics Committee.

Notifications made to the Company are finalized and decided in line with the Company's internal operations and procedures. The Company informs the Company Ethics Committee on important issues and other situations it deems necessary and seeks its opinion. The Company Ethics Committee may directly conduct the investigation process if deemed necessary. Those who violate the Code of Business Ethics or Company policies and procedures will be subject to various disciplinary sanctions, which may, if necessary, be requested to leave the job.

Disciplinary sanctions will also be applied to those who approve, direct or have knowledge of inappropriate behaviors and actions that violate the rules but fail to make the necessary notification appropriately. In addition, those who act negatively and behave against those who make any complaint or report or assist during the investigation are also not tolerated.

Intentional false and/or slanderous notifications are interpreted as violations of ethical rules. The Company or employee who is subject to false or slanderous notifications may take separate legal action against those who made the notification, within the scope of the Turkish Penal Code, Labor Law, Code of Obligations and other relevant legislation.

1.3.1. Ethical Violation Reporting

Employees can report suspected ethical violations through the company's Ethics Violation Reporting Channels listed below. Reports will be kept confidential.

Violation reports can be made in writing or verbally and do not require identification.

Ethics Line reporting channels have been put into use to ensure that our employees, customers and suppliers can report unethical behaviors, abuses and all kinds of non-conformities regarding the company to an independent organization without any worries, and ultimately to protect our group companies from all kinds of losses, including reputational risks.

Ethics Line is an independent system where they can report unethical behaviors, abuses and all kinds of non-conformities.

- By calling **444 Etik (3845)**
- By sending an e-mail to **efesan@etikhat.com.tr**
- **From the** www.etikhat.com.tr web address User Login
  (User Name: Raporhat   Password: 2021)
- By sending a message to **0552 Etik (3845) 000** WhatsApp line
- By sending an SMS to **0552 Etik (3845) 000**

In reporting, operators who are experts of the independent call center company assist and the name, contact information and all other information about the person making the notification (if requested) are kept confidential at every stage.

You can comfortably forward any questions you may have to the independent expert operators who will help you.

All information and documents reported on the Ethics Line can be accessed by authorized experts who enter the work area with the biometric system (fingerprint).

The person making the notification is not required to state his/her identity, however, if he/she discloses his/her identity information and does not want it to be shared with the company, it is assured that no harm whatsever shall befall to him/her, the matter will remain anonymous and will not be exposed in any way.

1.4. Ethics Committee

The Ethics committee, which reports to the Chairman of the Ferro Döküm San. ve Dış Tic. A.Ş. Board of Directors, was established to resolve conflicts of interest within the scope of the Ferro Döküm San. ve Dış Tic. A.Ş. Business Ethics Rules (FERRO-ETICS), to evaluate notifications sent to it regarding violations of ethical rules, and to make recommendations to the managements of the Group Companies regarding the paths, methods and practices to be followed in cases of violations of ethical rules. The Ethics committee consists of the following individuals:

Chairman: Quality Manager

• Member: Group Human Resources Manager

• Member: Lawyer

A representative from the Sustainability Department takes part in the Board as an observer without the right to vote.

1.4.1. Working Principles of the Ethics Committee

The Ethics committee conducts its work within the framework of the principles set out below:

- It keeps the identities of those who report and complain and those who report or complain confidential.
- Anyone who reports to the Ethics committee or the Ethics Line with their open identities is under the protection of the Ethics committee due to their notifications and they cannot be subjected to pressure, discrimination or mobbing.
- The Ethics Committee conducts the investigation as confidentially as possible.
- It has the authority to request information, documents and evidence related to the investigation directly from the unit that has it. It can examine any information and documents it obtains only limited to the subject of the investigation.
- The investigation process is recorded in a written report from the beginning. Information, evidence and documents are added to the report.
- The minutes are signed by the chairman and members.
- The investigation is handled urgently and the result is reached as quickly as possible.
- The decisions taken by the board are immediately put into practice.
- The relevant departments and authorities are informed about the result.
- The chairman and members of the board act independently and without being affected by the department managers they are affiliated with and the hierarchy within the organization while performing their duties on this issue. They cannot be pressured or suggested on the issue. They are completely independent.

- The Board may seek expert opinion if deemed necessary and may benefit from experts by taking measures that will not violate confidentiality principles during the investigation.

1.5. Training and Awareness

All employees receive regular training to understand the ethical code procedure and the company's ethical values.

Awareness is created to continuously draw attention to ethical values and procedures.

The Ethical Rules are reviewed every year, updated if necessary and communicated to employees. These ethical documents are also kept in the employee personnel file.

1.6. Monitoring and Reporting

The ethics committee and managers regularly monitor the effectiveness of the ethics rule procedure and the level of compliance with ethical values.

Regular reports are prepared on ethical violations, reports and decisions of the board.

All notifications received through the ethics line are classified in a certain format and periodically reported to the authorized persons designated in our company.

2. Ethical Working Principles and Rules

It is imperative that Ferro Döküm San. ve Dış Tic. A.Ş. and its employees act with honesty and integrity in all their endeavors, while avoiding situations that may create a conflicts of interest.

It is one of the most important responsibilities of all employees not utilizing the Company's resources, name, identity and power for personal benefit and to avoid situations that will negatively affect the reputation and image of the institution.

The following application principles determine the conflicts of interest situations that Company employees may encounter while performing their duties or in their personal lives due to business relationships. These principles shall guide the appropriate actions to be applied in such situations.

2.1. Activities That May Create Conflicts of Interest

Ferro Döküm is committed to encouraging its employees to adhere to the following principles to prevent conflicts of interest. All employees must fully comply with the situations and guidelines outlined below as activities that may create conflicts of interest.

Employees shall not engage in any business relationship with their family members, friends or other third parties that provide mutual or unconditional benefits.

Any exceptional cases are subject to the knowledge and approval of the Chairman of the Company's Board of Directors. Similarly, Company employees should also be careful against potential conflicts of interest that may arise due to their close family members working for the Company's competitors.

Employees shall not obtain any commercial benefit by leaking any information belonging to the Company from within, nor shall they cause others to obtain benefits.

Bribery, commission, and any form of giving or receiving favors are strictly prohibited under any circumstances.

It is essential that Ferro Döküm San. ve Dış Tic. A.Ş. employees do not work for another person and/or institution in return for a fee or similar benefit, under any name, during or outside working hours, and do not engage in activities that requires them to be considered a "merchant" or "tradesman" directly or indirectly.

However, employees working for another person (family member, friend, other third parties) and/or institution outside of working hours in return for a fee or similar benefit;

• Not create a conflict of interest with the duties they hold in the Company and other group company practices,

• Not create a conflict with other business ethics rules and policies supporting these rules,

• Not negatively affect continuation of their duties in the Company,

• Possible with the written approval of the Management as specified below.

Approval for positions below Director and Manager levels is granted by the relevant Director, with input from the Ethics Committee. The Ethics Committee provides approval for other employees.

Ferro Döküm San. ve Dış Tic. A.Ş. employees cannot work as a board member or auditor in companies other than the Group Companies without the approval of the Company's Board of Directors; nor they take positions with competitors or companies with which the Company has business relations.

In non-profit organizations and universities, employees may participate in social responsibility and charity roles with the written approval of the management, provided that these toles do not interfere their duties within the Company.

Managers who are in the position of making hiring decisions cannot hire their spouses, close relatives, and the relatives and friends of these individuals.

Managers cannot ask their employees to do political work or to become members of a party.

Employees cannot engage in any political activity during working hours and cannot occupy the time of their colleagues regarding such activities.

Employees cannot use the Company’s name, their position and/or title in the Company, and also Company resources during their political activities.

Employees are obliged to inform their employer of any discrepancies in the asset declaration they submitted at the beginning of their employment that is contrary to the normal flow of life.

2.2. Misconduct

It is unacceptable for employees to harm the Company by using their authority for their own benefit and/or that of their relatives and outside the care expected of them.

Employees cannot directly or indirectly gain personal gain from the Company's purchasing and sales activities and/or any transactions and contracts to which they are involved in.

Employees cannot engage in acts and behaviors that are contrary to ethics, law, Company discipline and working procedures.

2.3. Use of Resources

When utilizing resources on behalf of the Company, the Company's interests must be considered. The assets, facilities, and personnel of the Company cannot be used outside of it, regardless of the circumstances or for anyone else's benefit. All personnel must adhere to the principle of "savings in all matters.

The interests of the Company are taken into consideration to the maximum extent when project evaluations are made. Project management processes are thoroughly implemented and documented and technical evaluations of project results are conducted. Authorities and responsibilities are clearly defined and monitored thorougout all processes.

Proper resource utilization for the benefit of the Company also requires effective time management. During working hours, Company employees are expected to use their time wisely and refrain from personal tasks. Managers are prohibited from assigning employees personal work.

It is essential that no special visitors are accepted during working hours. Employees must schedule meetings for mandatory visitors only with prior approval of their superiors, in connection with the subject of the visit and within a reasonable time in a way that do not disrupt the workflow.

2.4. Relationships with Other Persons and/or Organizations with Which the Company Has Commercial Relationships

The sustainability and success of our commercial relations are directly related to the strategies and policies we follow in our interactions with the outside world. Other persons and/or organizations with whom we have commercial relations are shaped by a wide network consisting of business partners, suppliers, customers and consultants. Our priority is to manage these relations within the framework of mutual trust, transparency, sustainability and ethical rules. A successful commercial relation network supports its growth in the long term, increases the efficiency of operational processes and strengthens the innovation potential. In this context, Ferro Döküm strategic partnerships and partnerships play a critical role in achieving commercial goals.

2.4.1. Principles of Ethical Conduct in Commercial Relations

No special business relationship can be established with the Company's customers, subcontractors or suppliers and other persons and/or organizations with whom the Company has commercial relations. No personal loans and/or goods/services can be received, and no loans and/or goods/services can be given or received from other persons and/or organizations with whom the Company has commercial relations.

In relations with customers; no transaction can be made without the knowledge of the customer, even if it is in favor of the customer, no customer weaknesses can be taken advantage of, and no profit-making purpose can be pursued by providing incomplete or incorrect information to the customer.

The Company personnel cannot request gifts from other persons and/or organizations with whom the Company has commercial relations or make any insinuations in this direction.

No gifts, money, checks, property, free vacations, special discounts, etc. that will put the Company under obligation can be accepted.

No personal aid or donation can be accepted from any person or organization with whom the Company has a business relationship.

2.4.2. Supplier and Stakeholder Management Principles

- It is essential to maintain open communication channels with stakeholders, actively considering their criticisms and suggestions to foster positive relationships.
- Mutual value should be created in business relations with suppliers.
- Communication with suppliers and contractors should be conducted transparently, directly, and accurately.
- Decisions regarding the selection of suppliers and contractors must be based on objective criteria.
- During inspections and visits to suppliers and contractors, reasonable confidentiality and occupational safety protocols requested by the supplier should be adhered to.

2.5. Media Relations

Employees are prohibited from making positive or negative comments, statements, or explanations on behalf of the company through social media or other communication channels. Any statements to media organizations, participation in interviews, speaking at seminars or conferences, and involvement in advertising or promotional activities related to the company in social media and press publications require prior approval from senior management. Furthermore, no personal gain may be derived from these activities.

2.6. Representing the Company

Any fees earned by employees as a result of their duties in associations, employer unions, or similar non-governmental organizations representing the company shall be donated to the relevant institution or to designated channels specified by that institution. Similarly, any payments made by third parties to company employees for seminar speaker fees or related services shall be donated to the relevant institution or to the channels directed by it. In addition to monetary compensation, employees may accept gifts such as awards, plaques, or other items of symbolic value presented as mementos of the occasion.

2.7. Gift Acceptance and Giving Policy

It is imperative that Ferro Döküm San. ve Dış Tic. A.Ş. and its employees refrain from accepting gifts or benefits that could compromise their impartiality, decisions, or behaviors, and that they do not offer gifts or benefits to third parties or organizations that may create such effects. The following application principles govern the exchange of gifts that Company employees may engage in with third parties and organizations with whom they conduct business, establishing the guiding principles to be followed in this regard.

2.7.1 Application Principles

Company employees are prohibited from accepting any benefits or gifts, whether or not they possess economic value, that may influence or are likely to influence their impartiality, performance, or decision-making while executing their duties.

Employees may accept and/or offer gifts as specified in Article 3, or may agree to participate in a special application, provided that such gifts align with the Company's business objectives, comply with applicable legislation, and do not place the Company in a compromising position if disclosed to third parties.

Provided that the conditions outlined in the preceding article are fulfilled:

- Company employees may offer and accept entertainment, refreshments, and meals that are consistent with acceptable business standards, contingent upon the Company's approval.
- At seminars and similar events attended on behalf of the Company, employees may accept symbolic and commemorative gifts, such as awards or plaques, that are not monetary in natüre.
- Gifts or benefits that are directly or indirectly linked to any form of consideration are strictly prohibited.
- The acceptance, offering, or solicitation of bribes and/or commissions is categorically unacceptable under any circumstances.

- Company employees are prohibited from accepting gratuitous or loaned funds from subcontractors, suppliers, consultants, competitors, or customers, and are likewise barred from having travel expenses, event costs, or similar payments covered.

- The senior management of the Company is responsible for determining the types of gifts and promotional materials that may be offered to customers, dealers, and other third parties with whom the Company maintains business relations.

- Subject to the conditions outlined above, the Company may accept suitable products and services as gifts, provided that senior management is duly informed and grants approval.

- In exceptional circumstances where local cultural practices necessitate reciprocal gifts exceeding the values specified in the Company policy, such gifts may only be accepted on behalf of the Company and with the prior approval of senior management. In all instances, the exchange of gifts must be conducted in accordance with local cultural norms.

2.8. Policies on Protection of Confidential Information

Information constitutes one of the most critical assets for Ferro Döküm San. ve Dış Tic. A.Ş., serving as a cornerstone for the realization of the company's vision. In this regard, the effective utilization of information, accurate dissemination, and the safeguarding of confidentiality, integrity, and accessibility are collective responsibilities shared by all entities and employees within the organization. The following application principles define confidential information for the Company and outline the standards that employees are expected to adhere to concerning such information.

2.8.1 Application Principles

Confidential information includes, but is not limited to, information that may create a competitive disadvantage for Ferro Döküm San. ve Dış Tic. A.Ş., trade secrets, financial and other information that has not yet been disclosed to the public, information regarding personnel rights, personal data of our employees, customers and stakeholders, all project, machine and structure designs, R&D

process outputs, software created specifically for the company and information that we are obliged to protect within the framework of "confidentiality agreements" made with third parties.

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

- This information cannot be disclosed to third parties unless it is mandatory to do so under Official Authorities and Legislation.
- This information cannot be changed, copied or destroyed. Necessary measures are taken to ensure that the information is kept carefully, stored and not disclosed. Changes to the information are recorded along with its history.
- Confidential files cannot be taken out of the institution. Approval from the person responsible for the information or senior management must be obtained for confidential information that needs to be taken out of the institution.
- Passwords, user codes and similar identifying information used to access company information are kept confidential and are not disclosed to anyone other than authorized users.
- Company confidential information cannot be discussed in dining halls, cafeterias, elevators, service cars and similar public places, and cannot be shared on social media accounts and mobile phone applications. It can only be shared on the company's social media accounts and mobile applications by authorized personnel, within the scope and time permitted by the Company Management.
- Confidential information is classified according to its confidentiality levels and is clearly stated in the content of this information. Company personnel are aware of the confidentiality levels of the information they obtain due to their duties and act in accordance with this confidentiality. In case of any hesitation regarding the confidentiality level, the next higher confidentiality class is followed and if necessary, the opinion of the relevant manager is sought

- If information is shared with third parties and/or organizations for the benefit of the Company, a confidentiality agreement is signed for information sharing or a written confidentiality commitment is obtained from the other party in order to ensure that the responsibilities of these parties and organizations regarding the security and protection of the shared information are understood.

- Salary, fringe benefits and similar personal information of personnel, which reflect the company policy and are personal to the person, are confidential and cannot be disclosed to anyone other than the authorities. Information about the personnel is sent privately to the person. Personnel cannot disclose this information to others or cannot pressure other employees to disclose the information.

- The legislation regarding the Protection of Personal Data is complied with.

- The above ethical obligations regarding confidentiality continue for employees who leave the job for any reason after they leave the company.

2.9. Policy for Creating and Maintaining a Fair Working Environment

Ferro Döküm San. ve Dış Tic. A.Ş. considers the creation and maintenance of a fair working environment for employees as one of its most important priorities. The aim is to increase the success, development and loyalty of employees by creating a fair, employee-respectful, healthy and safe working environment that complies with all relevant laws and regulations. The following application principles determine the basic principles regarding the creation and maintenance of a fair working environment in companies.

2.9.1 Application Principles

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

- Ferro Döküm San. ve Dış Tic. A.Ş. Human Resources policies and practices ensure that all other practices such as recruitment, promotion-transfer-rotation, compensation, reward, social rights, etc. are fair.

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

- A positive and harmonious working environment that supports cooperation is created in the company, conflict environments are prevented and people with different beliefs, thoughts and opinions are ensured to work in harmony.

- Employees' private lives and personal spaces are respected.

- In addition to all immunities of employees, their physical, sexual and emotional immunities are also respected.

- Any violation of the immunity of individuals through physical, sexual and/or emotional harassment at the workplace or anywhere they are for work purposes is against the law and ethical rules, and this crime is not tolerated by the Company in any way. In this context, all kinds of measures are taken to ensure that employees work in a work environment where their physical, sexual and emotional immunity is protected.

- Violation of a person's physical integrity and/or sexual harassment of a person without physical contact is defined as sexual assault/harassment. Accordingly; it is unacceptable to exhibit any behavior that can be evaluated within this definition.

- “Psychological Harassment in the Workplace” (Mobbing), which is a set of malicious, intentional, negative attitudes and behaviors carried out by one or more people against another person or persons in the workplace, continuing systematically for a certain period of time, aiming to intimidate, pacify or remove from work; harming the personal values, professional status, social relations or health of the victim or victims, is also considered as one of the above-mentioned forms of harassment.

- The physical working environment and conditions of the workplace are ensured to be healthy and safe for all employees.

- In order for the basic activities carried out by Ferro Döküm San. ve Dış Tic. A.Ş. not to have negative effects on the environment, nature and living rights, it acts sensitively as a pioneer in terms of its responsibilities towards society and humanity and takes all the precautions required by the legislation. It develops the awareness and sensitivity of the employees on these issues.

- Managers cannot engage in arbitrary behaviors, pressure, insult and threatening practices against their employees.

- Equal opportunities are provided for the continuous development and participation of all employees, and importance is given to merit.

- Employees are encouraged to be individuals who are sensitive to social issues, respectful to all living beings, trustworthy and considerate of the peace of those around them.

- Sustainable development goals are taken into consideration in all human resources, production, quality-control, sales-marketing and all other management processes related to maintenance. In this direction, the social-economic and environmental balance is observed.

2.10. Payments and Protection of Rights

Ferro Döküm San. ve Dış Tic. A.Ş. employees' payments and personal rights are carried out fully and correctly.

Ferro Döküm San. ve Dış Tic. A.Ş. pays its employees their wages and rights in accordance with the relevant laws on time.

Suppliers must comply with all laws regulating wages and working hours, including minimum wage, overtime and other wage elements, and ensure that their employees receive the full social rights to which they are legally or contractually entitled.

2.11. Ensuring Regular Employment and Compliance with Working Hours

In our group, we take care to employ a number of employees appropriate to the workload, and we check that working hours are not exceeded and that regular leave is used. We take utmost care to place the right personnel in the right job.

Suppliers will not ask their employees to work more than the maximum hours permitted by law.

2.12. Granting the Right to Expression and Association

Our Group respects the right of its employees to join, form or not to join a union without fear of reprisal, intimidation or harassment and complies with all applicable local and national laws on freedom of association and the right to collective bargaining.

It supports the full provision and protection of freedom of thought and expression.

The interests of employees are respected.

Suppliers must respect the right of their employees to organize as provided for in applicable laws.

3. Responsibilities

As Ferro Döküm, our business ethics and sense of responsibility serve as a fundamental guide in all our commercial activities. Our company adopts a business culture based on the principles of honesty, justice, transparency and responsibility. Our ethical rules are aimed at ensuring that our employees, business partners and customers operate under fair and equal conditions by respecting their rights.

While achieving its sustainable growth targets, Ferro Döküm prioritizes its responsibilities towards society, the environment and its employees. In our operations, great importance is given to issues such as respect for human rights, protection of the environment and occupational health and safety. All our employees and business partners are obliged to act in accordance with these ethical standards, and this understanding of responsibility plays a critical role in maintaining the reliability and reputation of our company.

These ethical rules also ensure that our company's activities are carried out in a fair, responsible and accountable manner for all stakeholders.

3.1. Employee Responsibilities

Ferro Döküm has determined in detail the ethical rules regarding ethics and related policies and procedures, how we should behave and how we should do our job. Compliance with these rules is the primary responsibility of all employees. Accordingly, all Ferro Döküm San. ve Dış Tic. A.Ş. employees;

- Act in accordance with the laws and regulations under all circumstances,
- Read the Business Ethics Rules, know, understand, internalize the rules, principles and values included in them and act in accordance with them,
- Learn the general policies and procedures applicable to the company and related to their work,

- Consult with their manager and human resources regarding potential violations related to themselves or others,

- Report potential violations related to themselves or others immediately; to submit their notifications regarding these issues (based on reliable sources, information and documents as much as possible) to their manager and/or the Ethics Committee in writing or verbally, either anonymously or with a name,

- To follow the "Methods and Methods to be Followed When Making Ethical Decisions" defined in order to assist in acting in accordance with the rules and solving problems,

- To cooperate with the Ethics Committee in ethical investigations and to keep the information regarding the investigation confidential.

3.1.1. Ways and Methods to Follow in Ethical Decision-Making

To guide you in deciding on a course of action, you should follow the steps below and ask yourself these questions:

* Identifying the Incident, Decision or Problem

- Have you been asked to do something that you think might be wrong?

- Are you aware of a potentially illegal or unethical situation in your companies or with your business partners?

- Are you trying to make a decision and have doubts about how to proceed in accordance with business ethics?

* Think Before You Decide

- Try to clearly define and summarize the problem or question,

- Ask yourself why there is a dilemma,

-Consider the options, their consequences, and who might be affected,

-Consult others.

* Decide on a Plan of Action

- Identify your responsibilities,

-Review all relevant facts and information,

-Refer to appropriate company policies, procedures, and professional standards,

-Assess the risks and think about how to mitigate them,

-Try to develop the best course of action,

-Consult others.

* Test Your Decision

- Review ethical questions

-Review your decisions within the framework of the company's core values

-Make sure you consider company policies, laws, and professional standards

-Consult others and consider their opinions within your planned action plan

* Continue with Determination

- Share your decision with your reasons with the relevant parties.

-Share what you have learned and your success stories with others.

3.1.2. 4 Basic Questions to Consider

*Does this activity/behavior comply with laws, rules and traditions? (Standards)

*Does it comply with professional standards?

*Is it legal?

*Is this activity/behavior balanced and fair? Would we be bothered if a competitor (someone else) did the same? (Sense of justice)

Does it seem right to you?

*Would our company and stakeholders be uncomfortable if all the details of this activity were made public? (Emotions and ethical values)

*Would you be in a difficult situation or embarrassed if others knew that you were engaging in this behavior?

*Could it lead to negative consequences for you or your Company?

*Who else might be affected by this (other employees within the company, you, shareholders, etc.)?

*To what extent does the "perceived reality" match the "objective reality"?

*How would it be reflected in the media?

*What would a reasonable person think under the same circumstances?

3.2. Responsibilities of Managers

In addition to the responsibilities defined for all employees under FERRO ETHICS, managers at Ferro Döküm San. ve Dış Tic. A.Ş. have additional duties. Company managers are responsible for;

- Establishing and maintaining a company culture and work environment that supports ethical behavior,
- Leading by example in the application of ethical rules and training their employees on these rules,
- Encouraging employees to raise questions, complaints, and reports regarding ethics,
- Providing guidance when consulted on ethical matters, taking all reports seriously, and forwarding them to the Ethics Committee when necessary,

- Structuring business processes under their responsibility to minimize ethical risks and ensuring compliance with ethical standards by applying necessary methods and approaches.

3.3. Responsibilities of Ethics Committee Members and Others

The responsibilities of Ferro Döküm ethics committee members play a vital role in protecting our company's business ethics standards and ensuring compliance with these standards. Ethics committee members monitor those ethical principles are adhered to in all company activities and guide employees within this framework. The primary duties of these members include resolving ethical dilemmas that may be encountered in business processes, monitoring whether ethical standards are violated, and raising ethical awareness within the company.

Ethics committee members are responsible for developing policies to ensure that employees and business partners always act fairly, transparently, and responsibly. In addition, they examine complaints and feedback, initiate disciplinary processes in relevant cases, and ensure that a fair outcome is achieved for all parties. These responsibilities ensure the sustainability of our company's commitment to ethical values and social responsibilities.

3.3.1. Members of Ethics Committee

The Ethics Committee members are responsible for guiding and providing consultancy on questions and issues conveyed by employees regarding ethics within the company,

Contributing to the resolution of ethical nonconformities within the company and directing nonconformities that cannot be resolved within the company to the Ethics Committee,

Reporting ethical questions and nonconformities received by it, together with their results, to the Ethics Committee regularly or when requested,

Providing the necessary support to the investigations conducted by the Ethics Committee, Monitoring, following up and supporting the effectiveness of ethical practices carried out in the company.

3.3.2. Senior Management of the Company

Senior management is responsible for ensuring the effective implementation of the Business Ethics Rules specific to Ferro Ethics or similar company-specific Business Ethics Rules, and fostering a culture that supports these principles.

The Business Ethics Rules and all related policies are reviewed, revised and documented by the Human Resources Group Directorate with the recommendations of the Ethics Committee and announced to the Companies with the approval of the General Manager and the Chairman of the Board of Directors.

3.3.3. Human Resources Department of the Company

They are responsible for informing employees about the Code of Ethics, providing training at certain periods to ensure the comprehensibility of the policies and rules, and ensuring that this issue is continuously communicated with employees, ensuring that those who start working in the Company read the Code of Ethics, are informed about this issue, and that they sign the Employee Declaration.

3.3.4. Company Managements are responsible for, in cooperation with the Ethics Committee;

Guaranteeing the confidentiality of complaints and notifications made within the framework of the Ethics Rules and protecting individuals after their notifications,

Ensuring the occupational safety of employees who made notifications,

Ensuring that complaints and notifications are investigated in a timely, fair, consistent and sensitive manner and taking the necessary actions with determination as a result of violations.