

EMIKON ELECTRONICS INDUSTRY AND TRADE LIMITED COMPANY**CORPORATE COMPLIANCE POLICIES**

Ethics • Environment/OHS/Quality • Personal Data Protection/Confidentiality/Information Security

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Note: This document has been prepared to set out Emikon's corporate approach and core compliance principles. It does not constitute any specific third-party certification, additional warranty or unlimited undertaking.

Contents

1. Statement on Ethical Principles, Business Integrity and Anti-Corruption
2. Environmental, Occupational Health and Safety, Quality and Sustainability Policy
3. Personal Data Protection (KVKK), Confidentiality and Information Security Statement

EMIKON ELECTRONICS INDUSTRY AND TRADE LIMITED COMPANY**STATEMENT ON ETHICAL PRINCIPLES, BUSINESS INTEGRITY AND ANTI-CORRUPTION****1. Purpose**

Emikon Electronics Industry and Trade Limited Company (“Emikon” or the “Company”) conducts its activities in accordance with the principles of integrity, reliability, transparency, accountability, fair competition and compliance with law.

The purpose of this Statement is to establish Emikon’s core principles regarding business ethics, anti-corruption, conflicts of interest, gifts and hospitality, competition law, sanctions compliance, accuracy of records, confidentiality and supplier relations.

This Statement has been prepared taking into account Emikon’s current scale of operations, business model and contractual relationships, and reflects Emikon’s commitment to ethical and compliance standards within the framework of applicable legislation, customer specifications and contractual obligations.

2. General Principle

Emikon conducts its business in compliance with law and ethical rules. No commercial objective, time pressure, cost advantage, customer expectation or competitive condition may justify any conduct that is unlawful, unethical or liable to damage the Company’s reputation.

Emikon expects its employees and all persons with whom it has business relations to:

- act honestly and transparently;
- comply with applicable laws and contractual obligations;
- refrain from obtaining any unfair benefit;
- use Company resources with due care;
- protect confidential and commercially sensitive information; and
- avoid conduct that may damage Emikon’s reputation.

3. Compliance with Laws and Contractual Obligations

Emikon seeks to comply with the laws of the Republic of Türkiye and, in particular, with the applicable laws of the countries in which it operates or conducts business, as well as customer specifications, supplier registration requirements, quality and safety requirements and contractual obligations.

In this context, to the extent applicable, Emikon complies with obligations in the following areas:

- commercial law and the law of obligations;
- employment law;
- occupational health and safety;
- environmental legislation;
- protection of personal data;
- competition law;
- tax and accounting rules;

- customs and foreign trade legislation;
- sanctions and export control regulations; and
- intellectual and industrial property rights.

4. Anti-Bribery and Anti-Corruption

Emikon adopts a zero-tolerance approach to bribery, corruption, improper commissions, facilitation payments, trading in influence, embezzlement, false documents, sham transactions, off-the-record payments, improper donations or sponsorships and any similar practice contrary to law or ethical rules.

Emikon employees, managers and persons acting on behalf of Emikon:

- may not directly or indirectly offer, give, request or accept a bribe to or from public officials, private-sector employees, or representatives of customers or suppliers;
- may not provide money, gifts, services, hospitality, discounts, commissions or any other benefit in order to obtain, retain or expedite business or secure an unfair advantage for Emikon;
- may not obtain indirect benefits through third parties;
- may not prepare false invoices, expense records, service records, test reports, shipping documents or accounting records; and
- may not attempt to improperly influence tender, quotation, procurement, technical approval or acceptance processes.

Emikon requires all payments and commercial transactions to comply with law, contractual terms, commercial reality and applicable accounting-record requirements.

5. Relations with Public Officials

The utmost care shall be exercised in relations with public authorities, municipalities, customs authorities, tax offices, supervisory authorities, courts, law-enforcement bodies, state-owned enterprises and other entities of a public nature.

The following may not be provided to public officials or persons who may be regarded as public officials:

- cash or cash-equivalent benefits;
- personal gifts;
- hospitality capable of influencing a business decision;
- improper donations or sponsorships;
- facilitation payments; or
- personal advantages.

Mandatory dealings with public authorities shall be conducted solely in accordance with applicable legislation and official procedures.

6. Gifts, Hospitality and Representation Expenses

Emikon acknowledges that reasonable and good-faith representation and hospitality practices may be appropriate in the ordinary course of business. However, such practices must not be intended to influence decision-making processes, compromise impartiality or secure an improper advantage.

Gifts and hospitality must comply with the following principles:

- They must not consist of cash or cash equivalents.
- They must be reasonable in value, timing and frequency.
- They must not be offered or accepted during sensitive periods such as tenders, quotations, contract renewals, audits, acceptance procedures or disputes.
- They must be assessed more strictly where public officials are concerned.
- They must be accurately and transparently recorded in the Company's records.
- They must not place the recipient or provider under improper pressure.

In case of doubt, Company management approval must be obtained before the relevant action is taken.

7. Conflicts of Interest

Emikon employees, managers and persons acting on behalf of Emikon must avoid situations that may create a conflict between their personal interests and the interests of Emikon.

The following circumstances may create a risk of conflict of interest:

- conducting commercial transactions with persons or companies involving close relatives or personal relationships;
- obtaining a personal benefit from a supplier or customer;
- using Emikon's confidential information for personal purposes;
- holding a direct or indirect interest in a competitor, customer or supplier;
- relationships capable of affecting impartiality in procurement, pricing, quotation or supplier-selection processes;
- or
- using Emikon resources for personal purposes.

Where a potential conflict of interest arises, it must be disclosed to Company management without delay. Disclosure does not, in itself, constitute a breach; the essential requirement is that the potential risk be managed transparently.

8. Competition Law and Fair Trading

Emikon acts in accordance with the principles of free and fair competition. It does not enter into any agreement with competitors regarding price-fixing, market or customer allocation, bid-rigging, restrictions on production or sales, exchange of competitively sensitive commercial information or any other restriction of competition.

Emikon:

- provides honest information to customers and suppliers;
- does not make misleading or disparaging statements about competitors;
- acts transparently and lawfully in quotation and tender processes; and
- does not unlawfully obtain or use trade secrets or confidential information.

9. Sanctions, Anti-Money Laundering and Foreign Trade Compliance Principles

To the extent applicable to its activities, Emikon seeks to comply with sanctions, export-control, customs, embargo, anti-money laundering and counter-terrorist-financing rules.

In this context, Emikon:

- pays due attention to the commercial legitimacy of customers, suppliers and business partners;
- carefully assesses unusual payment requests, requests for payment to third-party accounts, transactions with no clear legitimate commercial purpose and suspicious intermediary structures;
- performs necessary checks in transactions that may present sanctions or export-control risks; and
- refrains from engaging in transactions contrary to applicable legislation.

This provision does not mean that Emikon is subject to obligations specifically applicable to professional financial institutions under the laws of any country; it reflects reasonable compliance measures appropriate to Emikon's own field of activity and commercial transactions.

10. Accuracy of Records and Documentation

Emikon requires its commercial and financial records to be maintained accurately, completely, promptly and in accordance with the facts.

Due care shall be taken to ensure the accuracy of the following documents:

- quotations;
- purchase orders;
- contracts;
- invoices;
- delivery notes;
- test and quality reports;
- FAT/SAT records;
- service forms;
- maintenance and field reports;
- payment and collection records;
- expense documents; and
- customer correspondence.

No employee or business partner may create any record that conceals its purpose or is misleading, incomplete, false or contrary to the facts.

11. Confidentiality, Trade Secrets and Intellectual Property

Emikon undertakes to protect trade secrets, technical drawings, project documents, quotations, pricing information, contracts, know-how, correspondence, personal data and other confidential information belonging to its customers, suppliers, employees and business partners.

Such information:

- may be used only to the extent required for business purposes;
- may not be shared with unauthorised persons;
- may not be used for personal purposes;
- may not be disclosed to third parties without the express permission of the customer or supplier; and
- shall be retained in accordance with the relevant contractual and confidentiality obligations.

Emikon respects the intellectual and industrial property rights of third parties.

12. Human Rights and Labour Principles

Emikon supports a safe, fair and non-discriminatory working environment that respects human dignity.

Emikon opposes:

- forced labour;
- child labour;
- discrimination;
- harassment, coercion or ill-treatment; and
- unlawful employment practices.

Emikon complies with applicable employment, social-security and occupational health and safety legislation in its employment relations. Emikon also expects its suppliers and subcontractors to comply with the same fundamental principles in relation to their own activities.

13. Suppliers and Subcontractors

When selecting suppliers and subcontractors, Emikon takes into account criteria such as quality, technical competence, commercial reliability, price, delivery capability, occupational health and safety, environmental compliance, ethical compliance and confidentiality.

Emikon expects its suppliers to:

- comply with applicable legislation;
- refrain from bribery and corruption;
- provide employees with lawful and safe working conditions;
- comply with environmental legislation;
- protect confidential information; and
- avoid conduct that may damage the reputation of Emikon or its customers.

Emikon's expectations of its suppliers do not mean that Emikon assumes unlimited responsibility for all activities of each supplier. Emikon acts with reasonable care and control within the scope of its own commercial relationship and contractual arrangements.

14. Reporting, Review and Prohibition of Retaliation

Suspected unethical conduct, bribery, corruption, conflicts of interest, confidentiality breaches, occupational-safety risks, environmental violations or other unlawful conduct may be reported to Company management.

No retaliation, pressure, threat, discrimination or adverse action shall be taken against persons who make a report in good faith.

Emikon reviews reported matters to a reasonable extent, taking into account the nature of the incident and available resources. Where necessary, explanations, documents or corrective measures may be requested from the relevant persons.

15. Potential Consequences of a Breach

Depending on the nature of the incident, conduct contrary to this Statement may result in:

- a warning;
- corrective or preventive action;
- review of the business relationship;
- suspension or termination of the contract;
- termination of the supplier relationship;
- compensation for losses; and
- where required, notification to the competent authorities.

16. Limitation of Liability

This Statement has been prepared to set out Emikon's ethics and compliance approach. Nothing in this Statement shall be construed as creating any additional, independent or unlimited legal undertaking against Emikon beyond applicable legislation or written agreements between the parties.

Emikon's obligations shall be assessed within the framework of applicable legislation, relevant contracts, customer specifications and Emikon's scale of operations.

EMIKON ELECTRONICS INDUSTRY AND TRADE LIMITED COMPANY

ENVIRONMENTAL, OCCUPATIONAL HEALTH AND SAFETY, QUALITY AND SUSTAINABILITY

POLICY

1. Purpose

Emikon Electronics Industry and Trade Limited Company (“Emikon” or the “Company”) seeks to conduct its industrial automation, electrical and electronic systems, panel manufacturing, engineering, project, service and field activities in an environmentally responsible, safe, high-quality and sustainable manner and in accordance with customer requirements.

The purpose of this Policy is to establish Emikon’s core approach to environmental matters, occupational health and safety, quality and sustainability, and to set out its corporate expectations for employees, customers, suppliers and business partners.

This Policy has been prepared taking into account Emikon’s current scale of operations and applicable legislation. Unless the existence of a management-system certification is separately confirmed in writing, this Policy alone does not mean that Emikon holds any particular ISO or similar certification.

2. General Commitment

Emikon seeks to comply with:

- environmental legislation;
- occupational health and safety legislation;
- customer technical specifications;
- quality and testing requirements;
- contractual obligations; and
- applicable national and international standards of business conduct.

3. Environmental Policy

Emikon seeks to take applicable and reasonable measures to reduce the environmental impact of its activities.

In this context, Emikon:

- complies with environmental legislation;
- promotes efficiency in the use of energy, water, raw materials, consumables and packaging;
- seeks to minimise waste generation wherever possible;
- takes care to segregate waste by type and arrange for its appropriate disposal;
- supports the transfer of recyclable materials to recycling processes;
- exercises due care to ensure that hazardous waste is managed in accordance with applicable legislation;
- pays attention to the safe use of chemicals, oils, paints, solvents, cleaning products and similar substances; and
- seeks to raise employee awareness to prevent incidents that may harm the environment.

4. Environmental Risks Arising from Electrical-Electronic Activities and Panel Manufacturing

Considering Emikon's field of activity, the environmentally appropriate management of cable, metal, plastic, packaging, electronic components, panel equipment, consumables and similar waste is important.

Emikon takes care to:

- segregate cable, metal and packaging waste;
- manage electronic waste through appropriate channels;
- ensure that oils, chemicals and other hazardous waste are disposed of through authorised or licensed persons or organisations;
- avoid causing damage to customer facilities or the environment during field activities; and
- reduce unnecessary packaging and resource use in delivery and shipping processes.

5. Energy and Resource Efficiency

Emikon supports the efficient use of energy and resources in office, workshop, production, testing and field activities.

In this context, Emikon seeks to:

- reduce unnecessary energy consumption;
- ensure equipment is used appropriately;
- take resource efficiency into account during maintenance and testing processes;
- prefer safe, durable and efficient systems in project solutions; and
- assess technical alternatives capable of improving energy efficiency in the engineering solutions offered to customers.

6. Occupational Health and Safety Policy

Emikon attaches importance to the health and safety of its employees, subcontractors, customers and other persons present at work sites.

Emikon:

- complies with applicable occupational health and safety legislation;
- promotes safe working conditions in field, installation, maintenance, service, panel-manufacturing, testing and commissioning activities;
- seeks to assess risks in advance and implement necessary precautions;
- encourages and, where required, mandates the use of personal protective equipment;
- acts cautiously in relation to electrical safety, mechanical hazards, work at height, lifting and handling, cutting and piercing equipment, hot work and similar risks;
- expects employees and other relevant persons to comply with occupational-safety instructions; and
- supports the reporting of occupational accidents, near misses and situations presenting safety risks.

7. Field Activities and Conduct at Customer Facilities

Emikon employees and persons performing field work on behalf of Emikon shall comply, at customer facilities, with:

- the customer's occupational health and safety rules;
- site entry and exit procedures;
- work permits;
- safety instructions;
- environmental and waste-management rules; and
- confidentiality and information-security requirements.

Work performed at customer facilities shall be carried out within the scope of the relevant contract, work order, technical specification, customer instructions and applicable legislation.

8. Quality Policy

Emikon adopts quality, reliability, technical compliance, traceability and timely delivery as guiding principles for the products and services it provides to customers.

In this context, Emikon:

- carefully reviews customer specifications and technical requirements;
- performs necessary controls during quotation, design, production, installation, testing, shipping and service processes;
- takes applicable technical standards into account in panel manufacturing, automation, electrical-electronic systems and engineering projects;
- ensures that products and services remain consistent with the contractual scope;
- maintains test and quality records accurately;
- seeks to identify and correct non-conformities and prevent their recurrence; and
- considers customer feedback as part of the quality-improvement process.

9. Testing, FAT/SAT and Documentation

To the extent required by the contractual scope and customer specification, Emikon prepares testing, inspection, FAT/SAT, service reports, technical documentation and delivery records.

Such documents shall be prepared so that they are:

- accurate;
- current;
- traceable;
- consistent with technical facts; and
- limited to the scope agreed with the customer.

Emikon does not make any false statement in testing or quality documentation. However, Emikon's testing and certification obligations are limited to the relevant contract, technical specification and written agreement.

10. Expectations of Suppliers and Subcontractors

Emikon expects its suppliers and subcontractors, in relation to their own activities, to:

- comply with environmental legislation;

- comply with occupational health and safety rules;
- provide high-quality and technically compliant products and services;
- refrain from using counterfeit, imitation or non-compliant products;
- provide required documents accurately and on time;
- protect confidential information; and
- refrain from bribery, corruption and unethical conduct.

Emikon does not assume unlimited responsibility for all activities of its suppliers. Emikon's responsibility shall be assessed within the framework of its own selection, instructions, knowledge, contractual relationship and reasonable sphere of control.

11. Continuous Improvement

Emikon seeks to improve its environmental, occupational health and safety, quality and sustainability performance in line with its scale of operations and available resources.

In this context:

- process non-conformities are reviewed;
- customer feedback is taken into account;
- employee awareness is enhanced;
- opportunities for operational efficiency are monitored; and
- risks and areas for improvement are periodically reviewed.

12. Clarification Regarding Certifications and Certificates

Emikon shall state that it holds any ISO, environmental, occupational health and safety, quality, sustainability, product-conformity or similar certification only where the relevant certificate actually exists and remains valid.

The principles set out in this Policy demonstrate Emikon's corporate approach; they do not, in themselves, indicate the existence of any specific third-party certification.

13. Limitation of Liability

This Policy has been prepared to set out Emikon's approach to environmental matters, occupational health and safety, quality and sustainability. Nothing in this Policy shall be construed as creating any additional, independent or unlimited legal undertaking against Emikon beyond applicable legislation or written agreements between the parties.

Emikon's obligations shall be assessed within the framework of applicable legislation, customer specifications, the contractual scope, its scale of operations and its reasonable sphere of control.

EMIKON ELECTRONICS INDUSTRY AND TRADE LIMITED COMPANY

PERSONAL DATA PROTECTION (KVKK), CONFIDENTIALITY AND INFORMATION SECURITY STATEMENT

1. Purpose

Emikon Electronics Industry and Trade Limited Company (“Emikon” or the “Company”) attaches importance to protecting personal data, trade secrets, technical information, project documents and other confidential information obtained in the course of its activities in accordance with law, the principle of good faith, contractual obligations and the confidentiality standards required by the relevant business activity.

The purpose of this Statement is to explain Emikon’s core approach to the protection of personal data, confidentiality, information security, protection of trade secrets and information sharing in business relationships.

2. Data Controller

Under the Turkish Personal Data Protection Law No. 6698 (“KVKK”), your personal data may be processed by Emikon, in its capacity as data controller, for the purposes and within the limits specified below.

Data Controller: Emikon Electronics Industry and Trade Limited Company

Address: Dudullu OSB Mah., DES Sanayi Sitesi, 103 Sok. No:34, 34776 Ümraniye/Istanbul, Türkiye

E-mail: emikon@emikon.com.tr

3. Emikon’s Approach to Personal Data Processing

The processing of personal data is not Emikon’s principal business activity. Nevertheless, Emikon may process a limited amount of personal data as required by its commercial activities.

For example, the name, surname, title, e-mail address, telephone number, signature, correspondence and contract information of representatives of customers, suppliers and business partners may constitute personal data. Accordingly, Emikon adopts the principle of processing personal data only to the extent required for the relevant business activity and in a limited, proportionate, lawful and secure manner.

4. Categories of Personal Data That May Be Processed

Depending on the nature of the business relationship, Emikon may process the following categories of personal data:

- Identity information: name, surname, title and signature information;
- Contact information: e-mail address, telephone number and business address;
- Customer and supplier transaction information: quotation, order, contract, invoice, delivery, service, project and correspondence records;
- Financial and accounting information: information contained in invoicing, payment, collection and current-account processes;
- Legal-transaction information: contracts, authorisation documents, commercial correspondence, notices, claims and dispute records;
- Physical-premises security information: visitor and CCTV records, where necessary;
- Transaction-security information: system-access records and IP/log records;

- Limited human-resources information relating to employees, job applicants, interns and consultants; and
- Limited information required by legislation in connection with occupational health and safety processes.

5. Purposes of Processing Personal Data

Personal data may be processed for the following purposes:

- conducting quotation, order, sales, procurement, production, project, maintenance, service and delivery processes;
- managing relations with customers, suppliers and business partners;
- entering into and performing contracts;
- conducting invoicing, accounting, payment and collection processes;
- conducting shipping, delivery, import/export, customs and logistics processes;
- conducting quality, testing, FAT/SAT, service and technical-support processes;
- fulfilling occupational health and safety obligations;
- managing legal claims, disputes and official applications;
- ensuring the security of Company premises and information systems;
- conducting supplier-compliance, risk and sanctions checks;
- responding to requests from competent public authorities; and
- conducting corporate communication, reporting, audit and archiving activities.

6. Legal Grounds

Personal data may be processed on the following legal grounds set out in Articles 5 and 6 of the KVKK:

- where expressly provided for by law;
- where processing is directly related to the establishment or performance of a contract;
- where processing is necessary for Emikon to fulfil its legal obligations;
- where processing is necessary for the establishment, exercise or protection of a right;
- where processing is necessary for Emikon's legitimate interests, provided that the fundamental rights and freedoms of the data subject are not adversely affected; and
- where required, the explicit consent of the data subject.

7. Methods of Collecting Personal Data

Personal data may be collected through:

- e-mail;
- telephone;
- the website;
- quotation and contracting processes;
- customer and supplier portals;
- meetings;
- exchange of business cards;
- visitor records;

- invoices and shipping documents;
- technical and project documents;
- job applications;
- physical documents; and
- electronic systems.

8. Transfer of Personal Data

Personal data may be shared, in accordance with the KVKK and solely for the purposes stated above, with:

- competent public authorities and institutions;
- certified public accountants, independent auditors, lawyers and consultants;
- banks, courier and logistics companies, customs brokers and insurance companies;
- customers, suppliers, subcontractors and business partners;
- information-technology, software, hosting, e-mail, cloud and technical-support service providers; and
- relevant parties involved in project, quality, testing, service, maintenance and technical-support processes.

Where personal data must be transferred abroad, the applicable provisions of the KVKK and other relevant legislation shall be taken into account.

9. Retention Period

Personal data shall be retained for as long as required by the purpose of processing, taking into account statutory limitation periods, retention periods and evidentiary requirements under applicable legislation.

Personal data whose retention period has expired shall be deleted, destroyed or anonymised in accordance with applicable legislation.

10. Protection of Confidential Information and Trade Secrets

Emikon undertakes to protect confidential information belonging to its customers, suppliers and business partners.

Confidential information may include, in particular:

- technical drawings;
- project documents;
- panel designs;
- automation software and configuration information;
- price quotations;
- contracts;
- commercial terms;
- customer lists;
- production and testing information;
- FAT/SAT reports;
- maintenance and service records;
- know-how;

- personal data; and
- information relating to customer facilities or processes.

Such information may be used only to the extent required for the relevant business activity, by authorised persons and in accordance with the relevant contract or customer instructions.

11. Information Security Principles

Emikon seeks to implement reasonable administrative and technical measures to ensure information security, taking into account its scale of operations and technical capabilities.

In this context:

- access to confidential information is limited on a need-to-know basis;
- documents and digital records are protected against unauthorised access;
- appropriate care is exercised regarding username and password security when accessing customer portals and systems;
- unauthorised copying, sharing or transfer is prohibited;
- project documents are shared only with relevant persons;
- due care is exercised in electronic correspondence;
- confidentiality agreements are executed where necessary;
- customer systems and documents are not used for personal purposes; and
- information-security risks or suspected data breaches are reported to Company management.

12. Customer Portals and Third-Party Systems

Emikon uses supplier portals, technical platforms, document-sharing systems and similar electronic systems provided by customers or business partners only within the scope of its authorisation.

Within such systems:

- unauthorised access may not be obtained;
- user credentials may not be shared with third parties;
- customer data may not be downloaded, copied or transferred without permission;
- no action may be taken that could compromise system security; and
- customer instructions and platform terms of use must be followed.

13. Suspected Data Breach or Confidentiality Breach

Any suspected personal-data breach, leakage of confidential information, unauthorised access, transmission to an incorrect recipient, lost document, suspicious e-mail, unauthorised disclosure of customer documents or similar risk must be reported to Company management without delay.

Depending on the nature of the breach, Emikon shall conduct the necessary review and assess the actions required under applicable legislation and contractual obligations.

14. Limitation of Liability

This Statement has been prepared to explain Emikon's approach to personal data protection, confidentiality and information security. Nothing in this Statement shall be construed as creating any additional, independent or unlimited legal undertaking against Emikon beyond applicable legislation or written agreements between the parties.

Emikon's obligations shall be assessed within the framework of applicable legislation, relevant contracts, customer specifications, the relevant data-processing activity, its scale of operations and its reasonable sphere of control.