

## **Trasta ESG Consulting Inc.**

### **CODE OF ETHICS**

#### **1. GENERAL PRINCIPLES**

All activities of Trasta ESG Danışmanlık A.Ş. (TRASTA ESG) are carried out within the framework of the following general principles. All Trasta ESG employees; They should act on the basis of these general principles in their relations with customers, suppliers, shareholders and other stakeholders.

##### **a. Honesty**

Trasta ESG carries out all its activities in accordance with the principle of honesty. It acts with integrity and honesty in its relations with its employees, customers, suppliers, shareholders and all stakeholders.

##### **b. Transparency**

Trasta ESG; It is transparent and open in its relations with its employees, customers, suppliers, shareholders and all stakeholders.

##### **c. Neutrality**

Trasta ESG does not discriminate between its employees, customers, suppliers, shareholders and other stakeholders on the basis of religion, language, race, gender, health status, marital status, political opinion. All Trasta ESG employees treat everyone fairly and equally, avoiding biased behavior.

##### **d. Privacy**

Care is taken to protect the private information of employees, customers, suppliers and other stakeholders, and this information is not allowed to be shared with third parties. Such private information may be used within Trasta ESG, by authorized persons, within the framework of the Code of Ethics and only within the framework of Trasta ESG business relations.

##### **e. Zero Tolerance for Discrimination and Harassment**

Trasta ESG approaches discrimination and all forms of harassment, including psychological harassment, within the framework of its "Zero Tolerance" policy.

##### **f. Compliance with Laws and Regulations**

Trasta ESG conducts all its activities in accordance with laws and regulations. It closely follows the laws and regulations and takes the necessary measures for compliance.

#### **2. RESPONSIBILITIES**

- The responsibilities of senior management, managers and all employees are listed below in order to effectively implement the Trasta ESG Code of Ethics throughout Trasta ESG.

##### **a. Board**

- The Board of Directors is responsible for the implementation of the Code of Ethics at the highest level.
- The members of the Board of Directors accept the Code of Ethics and comply with these principles.
- A suitable environment is provided within Trasta ESG for the implementation of the Code of Ethics.
- It is ensured that the necessary communication channels are provided for the reporting of acts contrary to the Code of Ethics.



#### **b. Administrators**

- All managers accept the Code of Ethics, comply with these principles and set an example for other employees with their behavior.
- It ensures that the Code of Ethics is understood and applied by the personnel working under its management.
- It ensures that the Code of Ethics is primarily placed and maintained in the units for which they are responsible.
- It cannot force employees to act contrary to the Code of Ethics under any circumstances and for any reason.
- It listens to the questions, complaints, suggestions and requests of the employees regarding the Code of Ethics and encourages the employees to convey their feedback.
- Evaluates the business processes related to the field of duty within the framework of the Code of Ethics, identifies the contrary situations and takes measures to ensure compliance with the Code of Ethics.

#### **c. All Trasta ESG Employees**

- All Trasta ESG employees accept and comply with the Code of Ethics.
- It strives for other employees to comply with the Code of Ethics and encourages employees in this regard.
- It notifies the behaviors and movements contrary to the Code of Ethics to its managers and the communication channels specified below.
- All employees are aware of the regulations, procedures and instructions concerning their fields of duty and Trasta ESG in general and apply them completely.

### **3. APPLICATIONS**

#### **a. Use of Trasta ESG Resources**

- Trasta always pays attention to the fair, effective and efficient use of ESG resources. The principle of savings is taken into account in all activities.
- Trasta ESG resources are not used for personal interests or for the benefit of any person or entity other than Trasta ESG.
- It is essential to prevent theft, deterioration or damage to Trasta ESG assets. To this end, due diligence is taken and Trasta ESG assets are protected to the maximum extent.
- By taking care to use working hours effectively and efficiently, it is ensured that personal affairs are handled outside of working hours.
- Company tools, mobile communication tools, computers and other tools and equipment allocated to employees are considered as Trasta ESG assets and are used within the principles set out above.
- When using the internet and e-mail through the Trasta ESG communication network, the rules required by the Trasta ESG legislation are followed in order to ensure information security and effective use of resources.
- In the use of social media, behaviors that will damage the reputation of Trasta ESG are avoided.

#### **b. Use of Information**

- All accounting and business records of Trasta ESG are kept accurately, completely and in accordance with the relevant regulations, and each employee fully fulfills their responsibilities in this regard.
- Trasta ESG employees never use the information they have due to their duties and positions for their own personal interests.
- Based on information obtained from Trasta ESG and not disclosed to the public, no unfair gain is obtained from the capital markets and unfair gain is not mediated by sharing this information with third parties.
- Non-public information (strategic plans, sales price information, production techniques, studies on new products and services, research and development activities, etc.) Trasta is not shared with third parties outside of ESG.
- When non-public information of Trasta ESG needs to be shared with third parties, measures are taken to prevent the misuse of the information, such as a confidentiality agreement.
- Non-public information about Trasta ESG is not discussed in public places such as food courts, elevators, transportation vehicles.
- Regulations, procedures and instructions regarding the security of information belonging to Trasta ESG are fully implemented. Necessary precautions are taken to ensure that this information is carefully stored, archived and not disclosed.

### **c. Conflicts of Interest**

- Trasta ESG interests are taken into account in all tasks and activities throughout Trasta ESG and conflicts of interest are avoided.
- Personal interests are not allowed to affect Trasta's ability to pursue ESG interests, which is a top priority.
- No benefits are provided to personal and close relatives/friends by using the duties, responsibilities or Trasta ESG identity in Trasta ESG.

#### **i. Roles Outside of Trasta ESG**

- ✓ It is only possible to serve as a member of the Board of Directors in Trasta non-ESG companies with the approval of the Board of Directors.
- ✓ Trasta ESG employees can volunteer in non-profit non-governmental organizations and charities. Care is taken to ensure that the activities within this scope do not disrupt the duties of the employees at Trasta ESG, do not create a conflict of interest and do not constitute a clear violation of Trasta ESG policies.
- ✓ Trasta ESG employees may be members of a political party, but they must be actively engaged in politics and policy; This situation is possible with the approval of one of the Company's senior managers, provided that it does not create a conflict of interest with the policies and activities of Trasta ESG, does not disrupt its duties at Trasta ESG.
- ✓ Trasta ESG employees; It is only possible for them to write articles in the media about company policies and decisions, the activities of the company, to give interviews, to make presentations or speeches only with the approval of one of the Company's senior managers.
- ✓ It is only possible for Trasta ESG employees to teach in professional organizations, education and training institutions, provided that they do not disrupt their duties at Trasta ESG.
- ✓ It is only possible to take part in institutions and organizations related to the field of activity of Trasta ESG (professional chambers, unions, chambers, associations, boards,

federations and other public board organizations) with the approval of the Board of Directors.

## **ii. Gifts & Hospitality**

- ✓ No gifts or benefits are requested from customers and suppliers.
- ✓ Hospitality and business lunch requests are not made from customers and suppliers. Business lunch offers from customers and suppliers are acceptable as long as they comply with local standards and are reasonable.
- ✓ Non-cash offers such as free holidays, discount vouchers, gift vouchers from customers and suppliers are also considered within the scope of gifts and benefits and are not accepted in principle. However, if the rejection of gift offers from customers and suppliers will be perceived as impolite and will offend the gift giver, it can be accepted, provided that its value does not exceed 50 US Dollars (or its equivalent in Turkish Lira).
- ✓ Such offers can only be accepted if all Trasta ESG employees are provided with the same rights.
- ✓ Gifts with symbolic value, such as plaques and mattresses, given from meetings or seminars attended on behalf of Trasta ESG, can be accepted.

## **iii. Close Relatives and Friends**

- ✓ While performing the duties within Trasta ESG, there is no mutually or unrequited business relationship with family members, close relatives and friends.
- ✓ In the case of family members, close relatives and friends working in supplier companies and customers, these relationships are not allowed to create a conflict of interest.
- ✓ If there are family members, close relatives and close friends working in Trasta ESG; These relationships are not allowed to influence decisions to be made within the company.
- ✓ All Trasta ESG employees maintain impartiality in all situations and evaluate the employees under their management according to their performance, contribution, knowledge and experience.
- ✓ Employees who have the authority to make hiring decisions; They do not make hiring decisions for family members, close relatives and friends. A recruitment decision can be made on the condition and approval that it is in the interest of Trasta ESG and that the Board of Directors is informed about it.
- ✓ Employees who have the authority to make purchasing decisions; They do not make purchasing decisions in the offers made by companies in which their family members, close relatives and friends are direct or indirect partners. A purchase decision can be made on the condition that this situation is clearly stated in the evaluations, it is in the interest of Trasta ESG and the Board of Directors is informed about this issue.
- ✓ This is clearly stated in the bids given by the companies in which former Trasta ESG employees are directly or indirectly partners or employees, and in all kinds of works done with these companies.
- ✓ Trasta ESG employees, who are not required to invest in the stocks of certain public companies under the Code of Ethics; They also do not invest on behalf of family members, close relatives and friends.

## **d. Relations with Other Institutions**

- In business relations with other persons and organizations other than Trasta ESG, we act by taking into account the General Principles of Trasta ESG Code of Ethics.

- In this context, the principles of accuracy, honesty, transparency, impartiality and confidentiality are observed in relations, laws, laws, instructions and regulations are complied with, and general moral rules are taken care of.

### **i. Relations with Customers and Suppliers**

- ✓ In relations with customers and suppliers, Trasta ESG interests are always considered at the highest level.
- ✓ No personal interest relationship is established with customers and suppliers.
- ✓ Promises made to customers are kept, promises that cannot be fulfilled are not made.
- ✓ Illegal and unethical behaviors are not engaged in order to obtain information about customers and suppliers.
- ✓ Information/documents that are not open to the public or that may be confidential or that are obtained involuntarily by any means about customers and suppliers or that reach Trasta ESG employees are never used or shared.
- ✓ Customers and suppliers are treated within the framework of respect, equality, courtesy and fairness.
- ✓ Misleading and deceptive behaviors are not engaged in against customers and consumers.
- ✓ The requirements of the contracts and protocols made with customers and suppliers are fulfilled.

### **ii. Relations with Competitors**

- ✓ The competition rules and laws in the places of activity are fully complied with, and the principle of integrity and honesty in competition is not compromised.
- ✓ Considering that the meetings, seminars or discussions in which the participants go beyond the limits stipulated in the competition rules, care is taken and if necessary, these environments are avoided.
- ✓ Illegal and unethical behavior is not engaged in order to obtain information about competitors.
- ✓ Information/documents that are not open to the public or that may be confidential or that are obtained involuntarily by any means about competitors or that reach Trasta ESG employees are never used or shared.
- ✓ Unfounded and unsourced rumors about competitors are not spread or used as tools for these rumors.

### **iii. Relations with Official Institutions**

- ✓ All kinds of information and documents requested by official institutions are provided accurately, completely and on time.
- ✓ Misleading and deceptive behaviors are not used in relations with official institutions. It is not tried to gain an advantage in favor of Trasta ESG by showing an existing situation differently than it is, and Trasta ESG interests are protected to the end in the eyes of laws and laws.
- ✓ When there is any doubt about the implementation of laws, laws and regulations, internal and external legal and financial consultancy resources serving Trasta ESG are consulted.
- ✓ No benefit may be offered, directly or indirectly, to a public official in exchange for a privileged transaction. No cash or cash equivalent payment can be made to anyone, even if it will result in the benefit of Trasta ESG, except in accordance with laws and legal regulations.
- ✓ It is also ensured that third parties (such as representatives, consultants) acting on behalf of Trasta ESG stay away from such offers in their work on behalf of Trasta ESG.



#### **4. BEHAVIORS CONTRARY TO THE CODE OF ETHICS**

- Trasta ESG regulations, procedures and instructions must be fully implemented in all tasks at Trasta ESG, as well as the Trasta ESG Code of Ethics. Those who violate the Trasta ESG Code of Ethics or its procedures, regulations and instructions may face disciplinary sanctions up to and including termination of employment.
- Trasta ESG Code of Ethics should be adopted and should not act contrary to these rules.
- Common sense should be exercised in all activities and decisions taken. The legality of the decisions and behaviors taken should be investigated, and whether they are fair and correct should be questioned.
- In case of any doubt about the compliance of an activity carried out or a decision taken with the Trasta ESG Code of Ethics, the following communication channels are consulted.
- Before the decisions to be taken regarding the activities carried out, it should be well considered how Trasta ESG, its employees, shareholders and all stakeholders will be affected by this decision.
- When you are aware of behaviors contrary to the Trasta ESG Code of Ethics, you must notify the relevant manager or the following communication channels.
- Care will be taken to keep the identities of the persons who report violations of the Code of Ethics confidential, and necessary investigations and investigations will be carried out.

#### **Contact Information**

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