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**A-Purpose:** This Business Ethics Policy has been prepared to establish and maintain a business culture based on the principles of integrity, reliability, transparency and compliance with the law in all activities of Flexati Hose. The purpose of the policy is to ensure that company activities are carried out in compliance with national and international legislation, reduce ethical risks and guarantee the maintenance of high ethical standards in relations with all stakeholders.

Flexati Hose accepts ethical values as one of the fundamental elements of corporate governance in its business processes and adopts a fair, responsible and sustainable approach in all its activities. This policy aims to guide employees and business partners in their decision-making processes by establishing ethical behavior standards within the company.

**B-Scope:** Covers all personnel, managers, temporary employees, subcontractors, suppliers, consultants and all business partners acting on behalf of Flexati Hose. All stakeholders are expected to act in accordance with the principles and rules specified in this policy.

**C-Responsibles:** Flexati Hose establishes regular monitoring and evaluation mechanisms in order to ensure the effective implementation of business ethics, anti-corruption and responsible information management practices. Handling complaints and violations, strengthening the ethical culture and evaluating the effectiveness of compliance activities are carried out under the responsibility of the Ethics Committee.

The Ethics Committee conducts evaluations within the scope of management review meetings at least once a year in order to assess the effectiveness of corporate ethics practices. These evaluations are carried out in line with the knowledge and approval of top management.

The following elements are taken into consideration during the review process:

- Feedback received from internal and external stakeholders
- Continuous monitoring and internal audit results
- Achievement status of determined objectives and performance indicators
- Employees' ethical awareness levels
- Innovative practices developed in ethics and compliance processes
- Data analyses and reporting outputs
- Complaints and violations submitted through the ethics whistleblowing line or reporting mechanisms

As a result of these evaluations, necessary improvement activities and action plans are established for identified areas of improvement and their implementation is monitored.

The Ethics Committee also regularly reviews company policies and procedures in line with changes in local and international legislation, updates in international standards or changes in the organizational structure and carries out necessary revisions in a timely manner.

Flexati Hose commits to full compliance with local laws and international regulations applicable in all countries where it operates. Behaviors contrary to this policy and related procedures may result in

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disciplinary sanctions, administrative sanctions or termination of the employment relationship within the framework of relevant legislation. The company adopts a zero-tolerance approach against ethical violations.

**D-Definitions:**

**E-Application:**

**1.Compliance with Laws and Regulations**

Flexati Hose accepts full compliance with national and international laws, regulations and rules applicable in all countries where it operates as a fundamental responsibility. Our company adopts the principle of compliance with the law in all business processes and commits to conducting its activities within the framework of relevant legislation.

Within this scope, Flexati Hose commits to full compliance with:

- Applicable national and international laws and regulations,
- Information security and data protection legislation,
- Legal regulations related to the protection of personal data and privacy,
- Competition, trade and tax legislation.

Flexati Hose employees, managers, suppliers and business partners may not engage in any activity contrary to applicable legislation and are obliged to act lawfully at every stage of company activities. In order to strengthen the ethical culture within the company and ensure sustainable compliance with legislation, the Business Ethics Policy and Whistleblower (Violation Reporting) Procedure are presented to employees during the onboarding process, and signed approval is obtained from employees confirming that they have read and understood these documents. Thus, it is aimed that all employees act consciously regarding ethical rules and legal obligations.

**2.Reference**

- UN Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Universal Declaration of Human Rights
- United Nations Sustainable Development Goals
- Supports working methods compliant with all national and international standards and legal regulations, including the United Nations Convention Against Corruption.

**3.Commitments**

**3.1. Combating Bribery and Corruption**

Flexati Hose strictly does not allow unethical practices such as bribery, corruption, commissions, inappropriate gifts or offering or accepting any privilege at any stage of its activities. Our company

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commits to adhering to the principles of integrity, transparency and accountability in all business processes.

Within this scope;

- Employees must act honestly, transparently and in compliance with ethical principles in all relationships conducted with public officials and private sector representatives. Gifts, payments, commissions or advantages may not be offered or accepted in order to provide privilege to any person or institution.
- Situations that may provide gifts, hospitality or similar benefits are evaluated in line with company procedures and, where necessary, are recorded with managerial approval.
- Giving or accepting gifts in sensitive transactions is fundamentally a situation to be avoided. In mandatory situations, transactions may only be carried out with managerial approval and by recording them transparently. Gift acceptance is limited to the determined value limit and no gift exceeding this limit may be accepted or given.
- Any situation involving suspicion of bribery or corruption must immediately be reported to the relevant management units or the Ethics Committee.
- Supplier and customer selection processes are based on objective criteria. Personal interests may not be pursued in these processes in any way.
- All employees are obliged to report situations that may create or potentially create conflicts of interest to their managers or relevant units without delay.

Flexati Hose considers combating bribery and corruption as a fundamental part of its corporate governance approach and implements a zero-tolerance policy in this regard.


### 3.2. Combating Fraud

Fraud includes all unethical behaviors carried out for the purpose of obtaining personal benefit such as forgery, false statements, fraudulent transactions, unauthorized use of company assets.

Within this scope;

- Employees are obliged to act in accordance with the principles of accuracy, transparency and accountability in all internal and external company transactions.
- Providing false information, falsification or forgery in financial records, reports and documents is strictly prohibited.
- Company assets should only be used for business purposes and unauthorized or personal use must be prevented.

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- Financial and operational processes are regularly reviewed and fraud risks are aimed to be prevented through control mechanisms.

- Situations causing suspicion of fraud must immediately be reported to management or relevant reporting mechanisms.

Flexati Hose adopts a zero-tolerance approach against fraud and applies necessary disciplinary and legal procedures when such behaviors are identified.

### **3.3. Conflict of Interest Management**

Conflict of interest refers to situations where an employee's personal interests conflict with or create the possibility of conflict with the interests of Flexati Hose. Our company expects all employees to perform their duties with impartiality, integrity and by prioritizing company interests.

Within this scope;

- Employees should stay away from decision-making processes that may directly or indirectly provide benefits for themselves or their relatives.
- In cases where there are kinship, partnership or similar personal relationships with suppliers, customers or business partners, these relationships must be openly disclosed to management.
- Employees are responsible for preventing any conflict between company interests and personal interests while performing their duties.

### **3.4. Combating Money Laundering**

Flexati Hose strictly refuses to be directly or indirectly involved in activities related to money laundering and financing of terrorism. Our company commits to conducting all financial transactions in compliance with national and international regulations.

Within this scope;

- Identity and financial verification processes of customers, suppliers and business partners are conducted carefully.
- Employees are obliged to immediately report suspicious financial transactions or unusual activities to relevant units.
- All financial processes are managed in accordance with applicable legislation and international AML (Anti-Money Laundering) standards.

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### 3.5. Fair Competition and Commercial Ethics

Flexati Hose commits to fully complying with competition rules in all markets where it operates and conducting its commercial activities fairly, honestly and transparently.

Within this scope;

- No agreements are made with competitors regarding price fixing, market sharing or restricting competition.
- Disseminating false, misleading or confidential information about competitor companies is strictly prohibited.
- Violation of competition rules is contrary to company policies and legal regulations and may lead to serious disciplinary and legal sanctions.

### 3.6. Information Security

Flexati Hose accepts protecting the confidentiality, integrity and availability of its information assets as part of its corporate responsibility. Accordingly, all necessary technical and administrative security measures are implemented.

Within this scope;

- Necessary security controls are implemented against unauthorized access, data loss and cyber attacks.
- Employees are obliged to ensure the security of the devices and systems they use and comply with security rules.
- Information security violations or suspicious situations must be reported to relevant units without delay.
- Awareness is created by providing information security training to all employees.
- The importance of information security policies is emphasized in employment contracts and orientation processes.

### 3.7. Data Security

Flexati Hose implements necessary technical and organizational measures to ensure the secure storage and protection of all data processed within the scope of its activities.

Within this scope;

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- Company data is stored on secure infrastructures, protected against unauthorized access and regularly backed up.
- Operational data management processes are carried out in line with determined standard procedures.
- Unauthorized sharing, alteration, deletion or manipulation of data is strictly prohibited.
- Data security violations must immediately be reported to relevant management or authorized units.

### **3.8. Protection of Personal Data and Privacy**

Flexati Hose accepts the protection of personal data belonging to its employees, customers, suppliers and business partners as a fundamental responsibility. Our company commits to full compliance with the applicable KVKK (Personal Data Protection Law), GDPR (General Data Protection Regulation) and other related privacy regulations regarding the processing and protection of personal data.

Within this scope;

- Personal data belonging to employees, customers and business partners is processed only for business purposes, to the extent necessary and within the framework of explicit consent or legal basis.
- Personal data obtained during recruitment processes and throughout employment are not shared with third parties without authorization except for legal obligations.
- Necessary technical and administrative measures are implemented to protect the confidentiality, security and integrity of personal data.
- Data owners' rights of access, correction, deletion, restriction of processing and objection are respected and necessary processes are provided to enable the use of these rights.


### **3.9. Protection of Company Assets**

The protection of all physical, digital, financial and intellectual property assets belonging to Flexati Hose is the responsibility of all employees. Correct, efficient and business-purpose-only use of company assets is essential.

Within this scope;

- Vehicles, equipment, software, systems and other company resources should only be used for business purposes.
- Unauthorized use of company assets, causing damage to them or using them for personal benefit is strictly prohibited.

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- Misuse of company assets is considered a disciplinary violation and necessary administrative sanctions are applied.
- Situations such as embezzlement, theft or intentional damage to company assets are subject to serious disciplinary and legal sanctions.

### 3.10. Social Media Use

Flexati Hose attaches importance to protecting the company's reputation and reliability in employees' use of social media. Shares made on social media platforms are expected to be in line with company values and ethical principles.

Within this scope;

- Employees may not share company secrets, customer information or confidential company data on their personal social media accounts.
- Official statements on behalf of the company may only be made by authorized persons.
- The company's reputation must not be damaged in social media posts and ethical rules and professional behavior principles must be observed.

### 4. Business Ethics Policy Approval Statement

Flexati Hose employees declare in writing during the onboarding and orientation period that they have read and understood the Business Ethics Policy. All employees accept that they will act in compliance with ethical principles, have the obligation to report unethical behaviors and that disciplinary processes will be implemented in case of violation of this policy.

### Annexes

#### Code of Ethical Conduct Guide: Sample Cases and Responses

This section has been prepared in order to raise awareness regarding ethical dilemmas that Flexati Hose employees may encounter in business processes and support correct behavior patterns. The sample cases below are intended to guide decision-making processes in compliance with ethical principles.

#### Case 1: Advantage Provided by a Supplier

##### Situation:

An employee working in the purchasing department receives an offer from a supplier, whose bidding process is ongoing, to cover airfare and accommodation expenses for participation in an overseas fair.

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**Comment:**

Such offers may create conflicts of interest and may be considered as indirect provision of advantage. The employee should not accept this offer and should immediately report the situation to their manager or the Ethics Committee. It is essential that all decisions in supplier selection processes are based on objective criteria.

**Case 2: Suspicion of Irregularity in Financial Records**

**Situation:**

An employee notices that some expenses in project cost reports do not match actual activities and suspects that this may be an incorrect accounting record.

**Comment:**

Accuracy of financial records is critically important for the reliability of the company. The employee should report this situation to their manager, Human Resources department or through the Ethics Reporting Mechanism. The confidentiality of employees making reports in good faith is protected and retaliation against them is not allowed under any circumstances.

**Case 3: Protection of Confidential Information**

**Situation:**

An employee shares technical information regarding a new product development project conducted within the company with a friend working in the sector during a conversation.

**Comment:**


Technical information belonging to the company may be considered within the scope of trade secrets and intellectual property. Sharing such information with unauthorized persons may lead to information security violations and create commercial risks for the company. Employees are obliged to protect the confidentiality of internal company information.

**Case 4: Social Media Sharing Related to the Company**

**Situation:**

An employee shares a photograph related to a production process carried out in the company facility on their social media account. Production equipment and customer order information are visible in the photograph.

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**Comment:**

Production processes, customer information and operational details may contain sensitive information for the company. Such shares may lead to information security and confidentiality violations. Employees should obtain approval from relevant managers before sharing content related to company activities and act in accordance with confidentiality rules.

**Frequently Asked Questions (FAQ)**

1.What should I do if I encounter a situation that I think is ethically risky?

Even if you do not have definite evidence, you may report situations you consider suspicious to your manager, Human Resources department or through the Ethics Reporting Mechanism. All reports are evaluated confidentially and employees making reports in good faith are protected.

2.Can I attend an event to which I am invited by a supplier or customer?

Invitations offered by persons or institutions with whom business relationships exist may create conflicts of interest. Therefore, in such a case, you must first obtain your manager's approval and act in accordance with company procedures.

3.Can I anonymously report a situation that I think constitutes an ethical violation?

Yes. Flexati Hose employees may anonymously report ethical violations through the Ethics Reporting Mechanism. The identity of the reporting person is kept confidential and retaliation against employees making reports in good faith is not allowed.

4.Is there any drawback to sharing internal company information outside of work?

Commercial, technical or operational information belonging to the company is confidential. Sharing such information with unauthorized persons may constitute an information security violation and create legal risks for the company. Therefore, employees are obliged to comply with confidentiality rules.

5.How does the process proceed when I make an ethical violation report?

Ethical violation reports are evaluated by the Ethics Committee. Necessary reviews and investigations are carried out, and appropriate actions are determined in line with the findings obtained. The principle of confidentiality is maintained throughout the process and no adverse action is taken against the reporting person.

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