



ETHICAL RULES AND WORKING PRINCIPLES

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I. OBJECTIVE AND SCOPE

Ethics, in its simplest sense, examines the generally accepted and universally accepted value judgments in human relations. Business ethics, on the other hand, covers the set of principles developed to guide behavior in the business world. While the basic values and principles of the OYAK Group guide our business ethics, they form our expectations, standards and ethical practices that form the basis of all our business relationships and transactions.

Ataer Mining's Code of Ethics and Working Principles covers Ataer Mining and all third parties acting on behalf of this Company and its employees.

II. CODE OF ETHICS AND WORKING PRINCIPLES

A. Honesty

Integrity and honesty are our primary values in all our business processes and relationships. We act with integrity and honesty in our relations with our employees and all our stakeholders*.

B. Avoiding Conflict of Interest

A conflict of interest is a situation that indicates the potential of a person or organization to obtain personal or corporate benefits by improperly using their status.

As Ataer Mining, we aim to stay away from situations that may create a conflict of interest in our business activities. In the event of a potential conflict of interest, we apply these methods when we believe that the interests of interested parties can be protected by legal and ethical methods.

In cases of hesitation, we consult our manager, ethical code counselor or the Ethics Committee.

i. Not to Take Action In Favor of Self and Relatives

It is essential that employees of Ataer Mining Company who have a relationship** including spouses and third degree relatives (including in-laws) are not in a reporting relationship with each other in the same organization or take part in decision-making mechanisms together.

Managers and human resources recruiters, who are in the position of making decisions in the recruitment processes, have to take measures to eliminate the conflict of interest in case they have a relationship with a candidate who has applied for a job, including spouse and third degree relatives.

This can be achieved by involving alternative human resources officers who do not have a conflict of interest situation.

Employees of Ataer Mining must not have financial interests in any organization that has a rival, supplier or customer relationship with or is trying to do business with Group companies in a way that may constitute a conflict of interest, as well as their spouses and third degree relatives. It is essential that Ataer Madencilik employees are not in partnership, board membership, consultancy or employee relations with these organizations.

* Persons, institutions, organizations and parties that we come into contact with or interact with within the scope of all our activities; potential employees, investors, analysts, non-governmental and public organizations, unions, subcontractors, competitors, media, public, etc., especially our employees, customers, suppliers and shareholders.

** First degree relatives are parents and their children; 2nd degree relatives are grandmother / grandfather, grandparents, siblings and grandchildren; Third-degree relatives include aunts, uncles, and nephews.

In the above-mentioned cases, employees are required to consult their managers, ethical code counselor or the Ethics Committee.

It is essential that Ataer Mining employees do not work directly or indirectly in any work that requires them to be considered 'traders' or 'merchant', and that they do not work for another person and/or institution, regardless of the name, during or outside working hours in return for a fee or similar benefit.

However, it is only possible for employees to work for another person (family member, friend, other third parties) and/or institution outside of working hours in return for a wage or similar benefit, provided that it does not create a conflict of interest with its current duties, does not constitute a problem in terms of the continuation of these duties and is approved by the Company's Human Resources Senior Manager and General Manager.

Personnel working as arbitrator, mediation, expert witness given by judicial or administrative authorities are excluded from this restriction.

ii. Accepting and Giving Gifts

Ataer Mining employees should not ask for gifts, gains, aid, hospitality, special discounts, commissions or discounts that may affect their impartiality, decisions and behaviors for their own benefit, or should not accept such offers. Gifts from persons or institutions with which we have a commercial relationship are not accepted, with the exception of gifts whose approximate value does not exceed 100 USD.

Our employees should not accept gifts of cash or cash equivalents of any amount or borrow money from suppliers, consultants, competitors or customers.

Our employees may organize entertainment and dining activities within reasonable limits in the business world and participate in similar activities. In seminars and similar organizations attended on behalf of the company, awards, plaques and similar gifts with symbolic value can be received as a memory of the day other than money.

Our employees are expected to pay attention to situations that may create a potential conflict of interest in terms of influencing the decision-making processes in activities (entertainment, free training, seminars, accommodation, excursions, meals, etc.) sponsored by or undertaken by third parties. Ataer Mining is aware that in certain cases, the rejection of such offers may adversely affect customer relations. Therefore, free conference, promotional meeting, training etc. from our 3rd party or our customers or potential customers. Purposeful participation offers, organizations open to general participation, sports and similar activities can only be accepted with the written approval of a senior manager.

Our employees cannot give gifts to institutions and persons with whom they have business relations, other than the gifts that the company has prepared for promotional purposes. Gifts and promotional materials determined to be given to customers, dealers or other third parties with whom they have business relations must be approved by the Human Resources Senior Manager.

In exceptional cases where local cultural values require mutual gifts above the values determined in the company policy, these gifts can only be accepted on behalf of the company, based on the evaluation to be made with the company's ethical code advisor. Gift exchanges should be made in accordance with local culture in all cases. In this context, it is essential that gifts accepted are evaluated within the organization rather than for personal use.

Giving, receiving or offering bribes and/or kickbacks is unacceptable under any circumstances.

iii. Political Activities

Ataer Mining employees have to observe the following conditions in their political activities individually and voluntarily.

- Employees should stay away from situations that may create a conflict of interest in their current duties and responsibilities due to the political activities they are involved in.
- Company name, title within the company and resources belonging to the company cannot be used in individual political activities
- Political propaganda cannot be made during working hours and in the workplace environment, employees cannot be asked to be members of political party in and way, and the time of other employees cannot be taken for these activities.

iv. Those Who Left the Job and Do Business with OYAK Group

In order for employees leaving Ataer Mining to do business with OYAK Group companies as a seller, contractor, consultancy, brokerage, representative, dealership or similar;

- There should be no disciplinary record,
- There should be no conflict of interest due to the duties undertaken in the company

In addition, if the employee who has left the job has held a position that provides access to sensitive information and commercial decision mechanisms in Group companies and wants to do business in the same or similar field of activity as his/her position within the Group, the employee will not be employed within 3 years from the date of departure. It is essential not to enter into a relationship. The Ethics Committee is authorized to evaluate and approve exceptional cases.

Provided that these conditions are met, a report to be prepared by the manager of the relevant unit must be approved by the Ethics Committee in order for the resigned to do business with the OYAK Group.

C. Protection of Trade Secrets and Confidentiality

Information is one of the most important assets that OYAK Group will use to realize its vision.

In this direction, effective use of information, correct sharing and ensuring the confidentiality, integrity and accessibility of information in this process are the joint responsibility of all our companies and employees.

Confidential information is not limited to these; In addition to the intellectual property rights of Ataer Mining and all kinds of innovations; the database written, found, developed or implemented by the personnel, printed communication materials, business processes, advertising, product packaging and labels, and business plans (marketing, product, technical), business strategies, strategic partnerships and information on partners, financial information, personnel. It includes personnel information, customer lists, price, product designs, know-how, specifications, identification information of potential and real customers, information about suppliers and any similar written, graphic or machine-readable information.

Code of Practice

The principles that Ataer Mining employees must show sensitivity to and comply with

regarding confidential information are listed below:

- Confidential information cannot be disclosed to third parties unless disclosure is required in accordance with judicial decisions and legislation
- Confidential information should not be altered, copied or destroyed. Necessary measures are taken to ensure that information is carefully kept, stored and not disclosed. Changes on the information are recorded with its history.
- Confidential documents and information should not be taken out of the institution. In cases where it is necessary to be taken out of the institution, the approval of the information officer and the top manager of the relevant upper unit (General Manager) must be obtained.
- Password, user codes, authorizations and similar identifying information used to access company information systems should be kept confidential and should not be disclosed to anyone other than authorized users.
- Company confidential information is stored in dining halls, cafeterias, elevator, service cars, etc. should not be spoken in public.
- If information is shared with third parties and/or organizations for the benefit of the company, a confidentiality agreement is first signed for information sharing in order to ensure that the responsibilities of these individuals and organizations regarding the security and protection of the shared information are understood, or a written confidentiality commitment is received from the other party. In these implementations, it is essential to get support from legal units.
- All official statements must be announced to investors, partners and the public in a complete, simultaneous and understandable manner, in line with equality, through the unit determined by the company.
- Unfounded statements and/or gossip about persons or institutions cannot be made.
- Wages, benefits, etc. of personnel that reflect the company policy and are personal. Personal information is confidential and should not be disclosed to anyone other than the authorities. Employee information is sent privately. Employees may not disclose this information to others or pressure other employees to disclose the information.
- Even if it is not stated in writing that is confidential, the confidentiality of all kinds of information and documents specified in the definition must be protected, and this responsibility of our employees continues during their employment at OYAK Group and in case they leave the job.

D. Our Responsibilities

As Ataer Mining, we act with a sense of responsibility in our business activities. In addition to our legal responsibilities, we take care to fulfill our responsibilities listed below towards our customers, employees, shareholders, suppliers and business partners, our competitors, society, humanity and on behalf of the OYAK Group.

i. Our Legal Responsibilities

We carry out all our current activities and transactions at home and abroad within the framework of the laws of the Republic of Turkey and international law, and provide accurate, complete and understandable information to legal regulatory institutions and organizations in a timely manner.

While carrying out all our business activities, we are at an equal distance to all kinds of public institutions and organizations, administrative bodies, non-governmental organizations and political parties without any expectation of benefit, and we fulfill our obligations with this sense of responsibility.

ii. Our Responsibilities Towards Our Customers

We work with a proactive approach that focuses on customer satisfaction and responds to the needs and demands of our customers in the shortest time and in the most correct way.

We deliver our services on time and under the conditions we promised, we approach our customers within the framework of the rules of respect, honor, justice, equality and courtesy. We carefully protect the confidential information of our customers.

iii. Our Responsibilities Towards Our Employees

We ensure that our employees' personal rights are fully and correctly used. We approach our employees honestly and fairly, and commit to a non-discriminatory, safe and healthy working environment.

We make the necessary effort for the individual development of our employees, and they will take place with the awareness of social responsibility.

We support them to volunteer for activities, and we observe the balance between business life and private life.

Establishing and maintaining a fair and safe working environment:

- Company practices comply with all applicable laws and regulations regarding employment and working life. Company employees also fulfill all legal requirements within the scope of their activities and act in accordance with legal regulations.
- Ataer Mining human resources policies and practices; recruitment, promotion-transfer-rotation, performance management, remuneration, rewarding, social rights, training etc. ensures that all other practices are fair.
- It is unacceptable to discriminate among employees within the organization based on language, race, color, gender, political opinion, belief, religion, sect, age, physical disability and similar reasons.
- A positive and harmonious working environment that supports cooperation is created in the company, and conflict environments are prevented, enabling people with different beliefs, thoughts and views to work in harmony.
- Religious propaganda cannot be made in the workplace environment.
- It is ensured that the physical working environment and conditions of the workplace are healthy and safe for all employees.
- It is forbidden for managers to enter into debt-credit relations with employees.

Respect and privacy in the workplace:

Ataer Mining employees act openly, respectfully, honestly, in a sense of responsibility and within the framework of courtesy while sharing their thoughts and opinions in their relations with each other.

- The private and family life and personal spaces of all employees are respected.
- All kinds of verbal, written and electronic communication between individuals cannot be recorded, shared with others and/or published without their prior consent. Even if this communication is recorded in accordance with the law, the dissemination and use of these records for any other purpose is prohibited.
- Personal information of personnel arising from the nature of the business relationship and that may be required in the workplace is not used for purposes

other than for their purposes and is not shared with third parties without the consent of the persons.

Harassment and psychological harassment:

- Violation of immunity by way of physical, sexual and/or emotional harassment is not tolerated against our employees and our stakeholders with whom we have a business relationship, at the workplace or at any place where they are due to work.
- Persons who report such violations or assist in the investigation. Potential negative attitudes and behaviors towards them are considered as violations of our ethical rules.
- Systematic and planned behaviors that aim to alienate the targeted person from work, decrease his performance, and cause him to resign, in a way that will be considered within the scope of psychological harassment (mobbing), will not be tolerated.

iv. Our Responsibilities Towards Our Suppliers / Business Partners

We act fairly and respectfully, as expected from a good customer, and show due diligence to fulfill our obligations on time. We carefully protect the confidential information of the people and organizations we do business with and our business partners.

v. Our Responsibilities to Our Competitors

We compete only in legal and ethical areas and avoid unfair competition.

The OYAK Group Competition Law Rules document sets out the principles and principles in terms of compliance with the legislation and is binding for all employees.

As Ataer Mining, we support efforts to ensure the targeted competitive structure within the society.

vi. Our Responsibilities towards Society and Humanity

Protection of democracy, human rights and the environment; social responsibility works, the elimination of crime and corruption are very important to us.

With the awareness of being a good citizen, it acts sensitively as a pioneer in social issues; we try to take a role in non-governmental organizations, services for the public interest. We are sensitive to the traditions and cultures of Turkey and the countries where we carry out international projects.

We act in accordance with the Labor Law and the International Labor Organization (ILO) agreements, to which the Republic of Turkey is a party, on the issue of not employing child labor, and we ensure that our suppliers comply within the scope of the said legislation.

vii. Our Responsibilities on Behalf of OYAK Group

Our business partners, customers and other stakeholders; they trust us because of our professional competence and integrity. We try to keep this reputation at the highest level.

We offer our services within the framework of company policies, professional standards, commitments and ethical rules, and we show the necessary dedication to fulfill our obligations.

We take care to serve in areas we believe we are and will be professionally competent, and we aim to work with customers, business partners and employees who meet the criteria of accuracy and legitimacy.

We do not work with those who harm the morality of the society and harm the environment and public health.

In public and in areas where the audience thinks we are speaking on behalf of our company, we only express our company's views, not ours.

We avoid expressions that may give the impression that the OYAK Group is being shared by third parties in the shares they make on social networking sites, blogs, dictionaries, forums, and e-mail groups.

OYAK Group When we encounter complex situations that may put our group companies at risk or that are beyond our knowledge and competence, we first consult the appropriate personnel by following the appropriate technical and administrative consultation procedures.

Information assets provided by the company must be used for business purposes. Within the scope of these information assets, hardware (desktop/laptop, terminal, portable data storage media, printer/fax/copiers, etc.), software (all software installed on clients and servers), service (e-mail, internet access, network resources) and company-owned data components.

OYAK Group reserves the right to impose backup, reporting, review and usage restrictions for corporate information assets held by employees on these platforms, when necessary.

We consider the interests of the corporation in the use of resources on behalf of Ataer Mining, we show sensitivity in the protection of company assets. We avoid loss, damage, misuse and waste of group assets. We do not use company assets and facilities outside of company business, under any name or for anyone's benefit, without the benefit of the company.

In cases where there is a public interest or necessity, the approval of the General Manager of the top manager of the relevant business unit is sought.

III. IMPLEMENTATION

A. Ways and Methods to Be Followed While Making Ethical Decisions

The following questions should be considered as a guide when deciding on an action plan:

- Is this activity/behavior in compliance with the law, internal policies and procedures?
- Is this activity/behavior balanced and fair? Would we be offended if the competitor firm (someone else) did it?
- Would our company and stakeholders be offended if all the details of this event were made public?
- To what extent does "perceived reality" coincide with "objective reality"? How would the situation be reflected in the media, and what would a reasonable person think?

B. Duties and Responsibilities

i. Duties and Responsibilities of Employees

Code of ethics and working principles set out the basic rules about how we should behave and do our job.

Compliance with these rules is the primary responsibility of all employees. In this direction, all Ataer Mining employees shall have these responsibilities:

- Acting in accordance with laws and regulations in all circumstances,
- Learning and applying the general and field-specific policies and procedures applicable to the company,

- Acting in full compliance with the rules and instructions within the scope of Occupational Health and Safety and to take the necessary precautions while doing business,
- Participating in trainings on ethical rules and working principles, reading and understanding relevant documents and acting in accordance with them,
- Declaring compliance with the Code of Ethics and Working Principles annually (only for monthly paid personnel),
- Notifying the Ethics Committee immediately, in writing or verbally, of the possible violations it has observed, through the ethical line communication channels, named or anonymously, and sensitively avoiding all kinds of slanderous notifications,
- Ensuring the cooperation with the Ethics Committee in ethical reviews and to keep the information related to the review confidential.

ii. Duties and Responsibilities of Code of Ethics Consultants

Code of Ethics Advisors shall have these responsibilities;

- Providing direction and consultancy on questions and issues raised by employees on ethics within the company,
- Referring ethical non-compliances that cannot be resolved within the company or whose solution requires investigation, to the Ethics Committee,
- Contributing to the resolution of internal ethical non-compliances received by the Ethics Committee upon the request of the Ethics Committee,
- Reporting ethical questions and non-compliances with the results to the Ethics Committee regularly or when requested,
- Being the contact person from the company in the investigations of the Ethics Committee and providing the necessary support to the investigations,
- Monitoring, following and supporting the effectiveness of ethical practices carried out in the company.

Code of Ethics Consultants are the top managers in charge of human resources within the Company.

iii. Duties and Responsibilities of Manager

Ataer Mining managers have additional responsibilities beyond the responsibilities defined for employees within the framework of the Code of Ethics and Working Principles. Accordingly, managers shall have these responsibilities:

- Ensuring the creation and maintenance of a corporate culture and working environment that supports ethical rules,
- Setting an example for the implementation of ethical rules with their behaviors, to train their employees on ethical rules,
- Supporting its employees in submitting their questions, complaints and notifications about ethical rules,
- Providing guidance on what to do when consulted, to take into account all notifications and to forward them to the Ethics Committee as soon as necessary,
- Ensuring that the business processes under its responsibility are structured in a way that minimizes the risks related to ethical issues and to implement the necessary methods and approaches to ensure compliance with ethical rules.

C. Conflict Resolution

i. Ethics Committee Organization

Incompatibilities on ethical issues are resolved within the Ataer Mining Ethics Committee. Ethics Committee consists of the Chairman of the Board of Directors, the

General Manager, the Chief Human Resources Officer and the Chief Legal Officer. The Human Resources Senior Manager acts as the rapporteur of the Ethics Committee. The functioning of the Ethics Committee, decision-making processes, relations with the Disciplinary Committees in companies and reporting practices are described in detail in the Disciplinary Practices Procedure.

Ethics Committee Working Principles

The ethics committee carries out its work within the framework of the following principles:

- Keeps notifications and complaints and the identity of those who make notifications or complaints confidential. It adopts a policy to prevent possible retaliatory attitudes and behaviors towards employees or individuals who report an ethical violation.
- Conducts the investigation within the rules of confidentiality.
- It has the authority to request information, documents and evidence related to the investigation directly from the unit available. It can examine all kinds of information and documents it has obtained, only limited to the subject of investigation.
- The investigation process is written down 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 promptly and the result is reached as quickly as possible.
- Decisions taken by the Board are put into effect immediately.
- The relevant departments and authorities are informed about the result.
- The chairman and members of the board act independently and unaffected by the department managers and the hierarchy within the organization while performing their duties on this issue. They cannot be pressured or indoctrinated on the subject.
- If the Board deems it necessary, it can seek expert opinion and benefit from experts by taking measures that will not violate the principles of confidentiality during the investigation.

Ataer Mining Code of Ethics and Working Principles have been published with the approval of the Chairman of the Board of Directors and the General Manager and are reviewed once a year in line with needs, changing conditions and current practices. For your questions and notifications, you can use the following communication channels or contact the members of the Ethics Committee directly.

E-mail : etik@ataermadencilik.com.tr

Mail : *To the address in Istanbul, as stated in our company's website. "To the Chairmanship of Ethics Committee "*.