

# SMART GÜNEŞ ENERJİSİ TEKNOLOJİLERİ ARGE ÜRETİM SAN. VE TİC. A.Ş.

## CODE OF PROFESSIONAL ETHICS

All SMART GÜNEŞ TEKNOLOJİLERİ employees must know, understand, and apply the principles contained in the Code of Professional Ethics. SMART ENERGY Code of Professional Ethics that applies to all workers, this includes temporary and fixed-term workers, as well as contractors and subcontractors.

### 1. Honesty and Integrity

Integrity and honesty are our primary values in all our business processes and relationships. In all our activities, transactions, and relationships, we act in accordance with the principles of integrity and honesty while fulfilling our behavior, duties and responsibilities towards the third parties we have relations with on behalf of SMART GÜNEŞ TECHNOLOGIES, our colleagues within the company, our managers, in short, all our internal and external customers.

### 2. Equality and Justice

Acting equitably and fairly in all our activities, transactions and relationships are our important and indispensable values. We treat each other fairly and respectfully; We do not engage in discriminatory behavior based on religion, language, race, gender or similar characteristics.

### 3. Compliance with Laws, Regulations and Rules

We act in accordance with the laws, regulations, and rules, and carry out all our work and transactions in accordance with the laws and regulations.

### 4. Developing Responsible Behaviors and Fulfilling Responsibilities

We know our place and importance in the whole and we exhibit responsible behavior towards our customers, other employees, partners, suppliers, society, and the environment in accordance with this awareness. We carry out all our activities and transactions within the framework of the law and provide accurate, complete, and understandable information to institutions and organizations in a timely manner.

### 5. Exhibiting Behaviors Conforming to SMART GÜNEŞ TEKNOLOJİLER Name and Image

SMART GÜNEŞ TEKNOLOJİLERİ has a superior respect and reputation due to its honest, fair and professional approach in all its relationships and practices, complying with the rules of business ethics, respecting society and the environment. Our employees naturally carry the responsibility of "representation" by being an employee of SMART GÜNEŞ TEKNOLOJİLERİ, and they fulfill this responsibility in a way that befits the image and name of SMART GÜNEŞ TEKNOLOJİLERİ.

### 6. Environmental Protection, Occupational Health and Safety

Protecting the environment and human health are the basic principles we prioritize in all our activities. In our business and working environment, where occupational safety is ensured at a high level, the environment and natural resources are protected and used consciously, we, as employees, embrace these values and engage in behavior, work and transactions in accordance with these values.

## **Implementation Principles Supporting the Code of Professional Ethics**

### **1. Efficient Use of Resources**

The interests of the Company are taken into account when using resources on behalf of the Company. Company assets, facilities and employees cannot be used outside the Company for any purpose other than serving the company's purposes, under any name and on behalf of anyone, without the benefit of the Company. Managers cannot assign employees to their personal work.

As all employees, we use company resources in the most efficient way possible. We make good use of "time", one of the most important resources, and complete meetings for mandatory visitors in a reasonable time without hindering the workflow.

### **2. Confidentiality**

It is forbidden to engage in behavior or actions that would conflict with the principle of confidentiality.

We share information about the company's commercial and technical issues and employees' personal rights with third parties only if necessary, with the approval of senior management.

Information about the institution, financial information, employee information, information about business strategies, contracts, information about business partners, suppliers and customers are confidential information and cannot be changed, copied or destroyed. We take the necessary precautions to ensure that information is kept carefully, stored and not disclosed. We do not take confidential files outside the institution. For confidential information that needs to be taken out of the institution, we obtain the approval of the person responsible for the information or the senior management. We do not make false statements and/or gossip about people or institutions.

Employee's wages, benefits and similar personal information, which reflect company policy and are personal, are confidential and cannot be disclosed to anyone except the authorities. Employee information is sent individually.

The employee is strictly prohibited from disclosing this information to others or pressuring other employees to disclose the information.

Complying with the rules of information confidentiality is one of the basic responsibilities of every employee, and in case of violation of the rules, there are sanctions up to and including termination of the employment contract.

### **3. IT Security**

Our principle regarding Information Technology Security is to keep the data security risk at the lowest possible level. Our employees, who have an important role in supporting the security of information in the electronic environment, must keep their passwords secret, lock the screen when not in front of the computer, and pay due attention to malicious software.

### **4. Conflict of Interest and Gaining Unfair Benefits**

We do not benefit ourselves, our relatives, our families and/or third parties and institutions/organizations with which we have business relations by taking advantage of our current duties. We do not carry out work on our own behalf or on behalf of third parties, including our close relatives, that may affect the important fundamental elements of SMART GÜNEŞ TEKNOLOJİLERİ and/or be contrary to the interests of the company.

We do not derive personal profit, directly or indirectly, from all transactions and agreements to which the Company is a party.

## **5. Working at Another Job**

It is essential that SMART GÜNEŞ TECHNOLOGIES employees do not work for another person and/or institution for a fee or similar benefit, during or outside working hours.

## **6. Policy on Accepting and Giving Gifts**

It is essential that employees do not accept gifts or benefits that may affect their impartiality, decisions and behavior, that are not in line with the course of business, that are intended to provide privileges or benefits, and that they do not attempt to provide gifts or benefits that may create such effects to third parties, institutions and organizations. Company employees are prohibited from accepting free or loan money from subcontractors, suppliers, consultants or customers, and from having them cover travel expenses, event expenses and similar payments.

Without obtaining approval, employees may give Company promotional materials in amounts for their personal use to their business partners and friends with whom they share certain shares, without serving any interest.

## **7. Bribery**

Receiving, giving or offering bribes and/or kickbacks is unacceptable under any circumstances.

No employee may offer, promise, give or allow money or anything of value to be given to any person with whom she/he has a business relationship, directly or indirectly, in order to obtain unfair advantage.

We carefully avoid unethical behavior such as bribery, corruption and abuse of position.

## **8. Relations with Media**

Making a statement to any broadcasting organization, making an interview, participating as a speaker in seminars, conferences and similar places are subject to the approval of the company's senior management. Official statements to the media can be made by persons expressly authorized by the management.

## **9. Responsibilities of Employees**

All SMART GÜNEŞ TEKNOLOJİLERİ Employees are expected to behave in compliance with the Company's procedures and rules and to maintain this principle in all their transactions and activities.

Employees are responsible for the following:

- Acting in accordance with the general and business-specific policies and procedures applicable to the company,
- Observing the compliance of colleagues as well as one's own compliance, warning colleagues in cases of non-compliance; If the result is not achieved, it is the responsibility of reporting the situation to the Human Resources Department.

## **10. Managers' Responsibility to Set an Example and Control**

All managers must ensure that their employees are aware of the SMART GÜNEŞ TEKNOLOJİLERİ Code of Professional Ethics. Managers are responsible for creating and maintaining a company culture and working environment that supports ethical rules, setting an example with their behavior in the implementation of ethical rules, and encouraging and supporting their employees in communicating their questions, complaints and notifications regarding ethical rules.

## **11. Resolution of Non-Compliance with the Code of Ethics**

Those who violate the Code of Professional Ethics or Company policies and procedures will be subject to various disciplinary sanctions, up to and including being asked to leave the job, if necessary. Disciplinary sanctions will also be applied to those who approve or direct inappropriate behavior and actions that cause violation of the rules, or those who have knowledge of these issues and do not make the necessary notification appropriately.

## **12. Relationships at the Workplace**

SMART GÜNEŞ TEKNOLOJİLERİ recognizes that, in some cases, close personal relationships may exist or develop in the workplace environment. To avoid a possible conflict of interest, or the perception of such a conflict, where there is a close relationship between two employees, the following elements will apply:

- No individual will manage or be responsible for another person with whom she/he has a close relationship in the same office or the same department.
- Even in the absence of direct superiority, no manager shall be involved in assignment, promotion or compensation decisions regarding an employee (or potential employee) with whom he or she has a close relationship.
- No two individuals in this situation will be involved in the same financing process chain (e.g. approval of timesheets, approval of purchase and expense forms, allowances, etc.).

In case a relationship occurs at work that causes a conflict of interest, the issue should be discussed with the Human Resources Department so that the necessary steps can be taken to prevent this conflict through an alternative assignment. Where an alternative assignment is not possible, the Human Resources Department will assist department managers to implement reasonable management processes to ensure that a potential conflict of interest is prevented. Remaining silent regarding this issue is unacceptable and it is the obligation of both parties to bring this issue to the company's knowledge and attention.

## **13. Guiding Questions in Determining Ethical Compliance**

"Guide Questions to be Considered in Ethical Terms" have been prepared to help act in accordance with the SMART GÜNEŞ TEKNOLOJİLERİ Code of Professional Ethics. When you are in doubt about how to decide or act in a situation you are in, you can ask yourself these questions and understand whether the situation is ethically appropriate or not based on your answers.

- Am I clear about how I should act according to the SMART GÜNEŞ TEKNOLOJİLERİ Code of Professional Ethics?
- Is my behavior in compliance with Company policies and procedures, laws and rules?
- Is this behavior balanced and fair? Would I feel disturbed if someone else did it?
- Is what I am asked to do in accordance with the law and the SMART GÜNEŞ TEKNOLOJİLERİ Code of Professional Ethics?
- Is the behavior I witnessed in compliance with the law and the SMART GÜNEŞ TEKNOLOJİLERİ Code of Professional Ethics?
- Would my company and our stakeholders be offended if full details of this behavior were made public?
- Would I be in a difficult situation or embarrassed if others knew that I was behaving this way?
- Could this behavior have negative consequences for me or my Company?
- Who else might be affected by this behavior?
- How would this behavior look from the outside?
- How would it be reflected in newspapers and social media?
- What would a reasonable person think in the same circumstances?

#### **14. Copyright and Other Intellectual Property Rights**

The copyright and other intellectual property rights of the materials you produce as a company employee during your employment will belong to the company. If you create or discover intellectual property that can be used in company business, you must notify the company. Its ownership will belong to the company. At SMART's request and discretion, you must provide any information, data, drawings, and assistance that the company may require to make the best use of the intellectual property. You must prepare all documents and fulfill all elements necessary for the Company to claim rights in any intellectual property related thereto.

#### **15. Discipline**

The purpose of the disciplinary process is to ensure that matters requiring disciplinary action are evaluated fairly and consistently. Our disciplinary process consists of the following stages.

- Verbal warning
- Defense request
- Written warning

When a person exhibits behavior that is not in compliance with the disciplinary procedure, her/his manager is responsible for notifying Human Resources via e-mail on the day he learns about the issue. The notification must include all details of the incident and be supported by photographs, if available.

Upon notification to Human Resources, the Defense Request Letter is prepared and delivered to the person. In case of verbal warnings, the conversation must be recorded, signed by the manager and the employee, and forwarded to Human Resources.

Relevant managers are obliged to inform their employees about the updated Company procedures and rules and ensure their implementation, and all our employees are obliged to know the updated company procedures and rules. The fact that the employee who acts contrary to the procedures and rules shows that she/he does not know the rules as the reason for the non-compliance will not prevent the implementation of the Disciplinary Regulation.

You can review all the details about the disciplinary process in the disciplinary procedure. All records related to the process will be kept in the personnel files of the employees.