

SEGER CODE OF ETHICAL BEHAVIOR

Moving Forward with Integrity

Anti-Corruption

No tolerance for bribery or corruption we do not. Comply with local and global trade laws we act.

In this context, our Responsibility

- Bribes can never be offered for any reason whatsoever, cannot be given, bribes cannot be asked or accepted.
- Persons who are contracted to act on behalf of SEGER and a formal mutual agreement with the organizations agreement is reached. The relevant agreement of the relevant person and organization comply with the terms and conditions and SEGER's Code of Conduct must be required.
- Facilitation or "bribe" payments should not be made. (These include payments to government officials such as towing or licensing to encourage them to take the actions they need to take small payments). The only exception is a recent is when you believe you are in personal danger. In this situation, you can safely remove yourself from the situation. must be done to remove it and the situation SEGER's Ethics Committee must be notified immediately.

Preventing Conflicts of Interest

Shared responsibility to avoid conflicts of interest we share. Conflicts of interest, special interests or our actions conflict with the company's interests or when they appear to be in conflict. External always transparent about activities and relationships must be done. Most of the time, open and honest discussion through which conflicts can be avoided or resolved. All employees, contract or temporary workers between personal and professional relationships, including likely to affect (or appear to affect), ethically address real or apparent conflicts of interest and avoid them if possible.

Our Responsibility

- Identified and potential conflicts of interest Ethics It is forwarded to the Board,
- Situations that may make it difficult to be objective and personal relationships are avoided,
- Intervening in the performance of your business at SEGER external employment or business dealings that may involve is avoided,
- SEGER's assets, proprietary information or information your position is never used for personal gain,
- Suppliers, customers and everyone who does business with SEGER are dealt with impartially, professionally and fairly
- If a potential or actual conflict of interest is identified, this situation is immediately reported to the Ethics Committee.

Quality

The products and services we offer to our customers quality, our continued success and profitable growth is of critical importance. Focus on quality, meet the requirements of our customers and ensure that our products and services at the right quality levels, on time and at the agreed cost.

Our Responsibility

- Acts in accordance with the Quality Policy.
- We recognize customers' needs, structures and objectives. understanding and providing the best possible service.
- Providing customers with the latest technology, sales and financial by offering the highest level of quality standard at all times. to carry the same behavior that customers expect from SEGER.
- The same behavior customers expect from SEGER is expected from suppliers.

- All quality control standards, customer requirements, product testing procedures are complied with.
- Unless authorized by the customer and permitted by commercial practice, we shall not use the products parts and service features are not changed.

Gifts, Hospitality and Travel

Gifts, hospitality and travel help build goodwill and can help strengthen a business relationship. These courtesies (goods, favors, benefits, wages, services, entertainment, accommodation, tickets, travel, business offers, etc.) are common and expected in many cultures. At the same time, the truth about personal integrity or perceived concerns. Inappropriate that creates a business advantage, or even someone's work-related from anything that seems to affect his judgment is important to avoid.

Our Responsibility

- Create an inappropriate business advantage or even interfere with someone's business from anything that seems to affect his judgment about are avoided.
- Any gift that does not comply with our policies (goods, favors, benefits, wages, services, entertainment, accommodation, tickets, travel, job offers, etc.), politely must be rejected and the manager must be informed.

Fair and Legal Competition

Fair and open competition benefits SEGER, its customers and benefits communities. Is honest and fair for business, compete solely on the merits of our products and services We do. Competition and antitrust laws are complex and Failure to comply with these will result in both SEGER and the persons concerned could have serious consequences.

Our Responsibility

- How competition laws affect our business and our responsibilities in this direction should be understood. When necessary, company lawyers should be consulted about the competitors.
- Approval from the manager before meeting with competitors must be received.

- The persons specified in the table of communication with competitors and may be discussed, except for the matters set out below. See Seger internal-external Communication table.
- The competitor must not be contacted about the following:
 - Prices, payment terms, sales volume, contract issues affecting the price such as conditions
 - Customers or potential customers
 - Production or inventory levels
 - Including views on supply and demand market situation
 - Bids and bidding process
 - Production, sales region, tender, products, customers or divide suppliers
 - R&D activities
- Deception or deception to get information about competitors spying should not take place.

Prevention of Money Laundering

We comply with money laundering laws around the world. Money laundering is the practice of companies or individuals the revenues they generate from their activities, their resources act in a way that conceals and legitimizes to conceal or disguise the offense. Crime proceeds, not only money, but also the proceeds of criminal activity all kinds of assets, real estate and intangible presence. All our operations, SEGER products such funds to pay for their services against its use.

Our Responsibility

- When making payments to or from third parties accepting money, subject to SEGER's financial policies and procedures must be followed
- Suspicion of any improper activity in the event of a violation, the "Ethics Committee" should be contacted.
- All employees are responsible for preventing money laundering, financial crimes and preventing terrorist financing and economic sanctions the laws and regulations that exist to enforce them, comply with regulatory requirements and guidelines.

Financial Integrity

SEGER will use a specific set of tools to let them do their job. share information with employees, but they don't always may not disclose to the public. With non-public information trading and non-public information forwarding to others violates SEGER's policy and is considered illegal. SEGER's financial books, records and accounts, in accordance with applicable laws and regulations, in accordance with the standards, SEGER's policies all transactions and activities in an accurate and fair manner is done. Although the finance team has specific responsibilities, record operational results and maintain relevant records All employees are responsible for the process.

Our Responsibility

- All information prepared, processed or approved and business records are accurate, complete and comply with applicable laws, standards and procedures is appropriate.
- Conduct an audit of SEGER's financial statements or the independent accountant who conducted the review directly or indirectly coerce, manipulate to induce, mislead or fraudulently influence no such behavior may be engaged in.
- All documents supporting the true nature of a transaction and evidence should be kept.
- Always cooperate with SEGER's internal and external auditors and be open and honest with them.
- In legal proceedings, records to avoid disclosure must not be stored or destroyed.
- All copies, including electronic and paper copies record that applies to records and information in the format and a retention procedure should be in place.
- In ongoing or anticipated litigation, the state investigations or audits, SEGER's company the instructions of their lawyers should be taken into account.

Company Assets

And Protection of Confidential Information Ensuring the security, protection and All employees are responsible for its economic use. Including time, materials, equipment and information resources are used exclusively for company activities. Company

assets shall be used in accordance with the law by executive authorization decision. Is not affecting job performance or workplace as long as it doesn't demoralize you. Can be used. All employees must observe appropriate safety precautions. Is obliged to take and the material or immaterial company treat company property with respect and not misuse company assets. Should not use it or use it carelessly.

All employees must not disclose SEGER's confidential or proprietary information and SEGER's assets, including its intellectual property as well as the following are entrusted to us by our business partners is responsible for safeguarding the property and resources acquired. Responsible use of SEGER's assets, value ideas to transform, compete effectively and to maintain the trust of our stakeholders.

Our Responsibility

- Unless otherwise authorized or legally required to disclose confidential information should not be shared unless necessary.
- All assets are subject to theft, loss, damage or misuse. must be protected against use.
- Without written authorization, SEGER's assets may be used for personal benefit or cannot be used for the benefit of others. Need for use arises, Seger equipment shall not be liable for the with the written approval of the department manager can be taken out of the company, provided that it is brought back. For this "Fixed Asset Escrow Form" is used for this purpose.
- SEGER's assets may be used for illegal purposes ensure that they are not used.
- Assets, including confidential information, are properly labeled, classified and securely used and disposed of.
- Confidentiality obligations even after leaving SEGER continues for all employees.
- SEGER's information (in electronic or paper format), Stored on a device belonging to SEGER or elsewhere get, must be returned before departure.
- Any data on SEGER's devices, including e-mails information is the property of SEGER and as required by law should not be used for private purposes except in special circumstances.
- Newly recruited employees should also be asked

to return to their previous workplaces. Confidential information should not be requested.

- All employees must ensure that all stakeholders' confidential information to protect confidentiality.
- All employees must ensure confidentiality before starting work. Must sign a contract

International Trade Compliance

SEGER responds to country-specific trade regulations complies. In case of the opposite of compliance can result in significant penalties and business interruptions. SEGER employees performing import and export operations in a clear, accurate manner, in compliance with laws and regulations They do their work. Import and export transactions are subject to the law. To be carried out in accordance with the relevant legislation by experts in charge of foreign trade in advance evaluated. Cross-border transformation of products, services and technologies trading, all employees are responsible for must comply with foreign trade and customs laws. All import and export documents must be submitted to the customs authorities is declared accurately and transparently.

Our Responsibility

- The rules are complex and subject to change taking into account trade compliance laws and regulations should be kept up to date.
- Import or export products, technologies, services necessary licenses and approvals must be obtained before it can be shipped.
- A product is ready for shipment along the logistics chain. From the moment it happens until it reaches the intended destination until the safety of the products is protected.
- It must be clear with whom and where business is conducted and any without neglecting the obligation of trade sanctions guarantee that it can legally trade with the party must be taken.

External Communication

Employees making public statements about SEGER, especially stakeholders such as media, business partners, competitors affects SEGER's image in

the eyes of the public. Public on behalf of SEGER disclosures may only be made by specially authorized persons by SEGER.

SEGER may also include sponsorship as part of external communication as a promotional and public relations organization. SEGER, promotion and public SEGER may carry out sponsorship work for relations purposes. SEGER's sponsorship for sports, culture, science and society covers other areas that are important. Sponsorship can only be accessed by permitted within the framework of internal regulations.

Our Responsibility

- All reports filed with the government agency and documents, as well as all other public disclosures and communications are full, fair, accurate, timely and understandable.
- Media inquiries and questions Corporate Communications It should be forwarded to the authorized person.
- Untrue statements on behalf of SEGER should be avoided.
- Employees can make their private views public but never imply that they speak for SEGER should not. This is especially true when using social media applies.
- Before you make a presentation, you must ensure that the presentation conformity with the corporate language and the department to which it reports that it does not contain confidential information approval must be obtained from the manager.

Relations with Customers

SEGER values its customers and engages with them in a fair builds a relationship. An honest and transparent relationship based on mutual trust relationship is established. By understanding the demands of our customers, we are able to efficient service process is offered. Our customer service based on the company's values. It is also based on respect, courtesy and focused on efficiency. Our team is trained and trained to the highest to provide service at quality standards, mutual we will try to build a relationship based on trust, we will do our job fairly. Will execute our products and services in a to embrace communication based on accurate information trained.

Our Responsibility

- Our commitments and contractual obligations our obligations are fulfilled
- About our products, services and prices communicate honestly.
- Anticipate expectations beyond customers' demands and will be covered.

Relations with Suppliers

Our supplier relationships are legal, trust, honest and fair based on practices. These relationships are based on fair trade environment, we offer our products and services at a competitive price to deliver. By choosing strong and reliable partners it is important for us to continue our business activities. This is Therefore, its suppliers and service providers have been identified carefully with scoring system according to specifications and avoid any inappropriate choices. This is priority to local suppliers that meet specifications given.

Suppliers and suppliers with whom any of our employees have a personal connection the possibility of conflict of interest with service providers no cooperation in return. The activities of our suppliers recognize and respect the different legal and cultural environments in which they operate but wherever they are, they can only be ethical, legal and incorporate sustainable practices into its organization with suppliers who do.

Our Responsibility

- Socialization of suppliers and service providers, environmental, governance and economic impacts is taken into account.
- Sustainable development of suppliers and sustainable meetings, trainings, information and information programs sharing is done.
- No bribes, favors or offers are accepted from suppliers. Is not provided.
- Information of suppliers and service providers (pricing, intellectual property, competitive advantage, etc.) kept confidential and other suppliers for any reason, service providers, competitors and third parties is not shared.
- We value human rights and include them in our

operations. suppliers that are committed to equality, inclusion and diversity.

- Equality, inclusion and diversity (race, gender, age, disability, sexual orientation, religion, political opinion, national, ethnicity, etc.) who take care to work within the scope of work with suppliers.
- Products delivered safely and on time and work with suppliers that provide services.
- Supplier and service provider assessment is made and the results are shared with the parties. shared.
- Child labor exploitation or forced labor business partnerships are not made with suppliers who do so.
- SEGER Supplier Code of Conduct is applicable to all suppliers and service providers and compliance is expected. Business partnerships with those who fail to comply are terminated.
- We maintain regular, honest and and transparent relationship is established.
- Any non-compliance with laws, misconduct detected "Ethics Committee" in case of suspicion or doubt is notified.

Respect for Our People Equality, Diversity and Inclusion

Every employee is an important member of the SEGER team. Equality to provide an inclusive environment recognized for its diversity and we are committed to treating everyone fairly, with respect and dignity we behave. Our colleagues or our operations any discrimination against other affected persons is not tolerated.

SEGER ensures a safe, respectful and inclusive environment for all employees. And the communities in which we operate provide trusted workplaces that reflect its diversity for a skilled and diverse workforce. A skilled and diverse workforce strengthens our company and its competitive advantage. Every employee has the right to contribute freely to SEGER's success. every effort to create an open and inclusive workplace where each of us plays an important role. At SEGER, we value we value the diverse backgrounds of our colleagues, cultures and perspectives. At SEGER race, gender, age, disability, sexual orientation, religion, political everyone, regardless of opinion, national or ethnic origin a work

that is inclusive and does not compromise the principle of equality environment.

Our Responsibility

- Everyone is treated fairly, respectfully and with dignity.
- Business decisions are made without compromising the principle of equality, are recruited on merit.
- Inclusion of diverse backgrounds and perspectives attention is paid to our own behavior to promote
- Fair and equal treatment of others in all employment-related decisions behavior.
- The impact of different cultures on values and behaviors influence is recognized.
- Each employee treats others with respect and empathy on creating a truly inclusive workplace does its part.
- To build good professional relationships with our colleagues value is added to them by giving them time.
- Leaders and managers lead by positive example; By leading by positive example.
- They set the necessary conditions to prevent prejudices from affecting behaviors efforts are made.
- Employment of female employees is important for SEGER.

Employee Welfare and Development

To fulfill our roles effectively and to take responsibility for our personal and professional development we care. To support this, SEGER is committed organizes training programs covering its employees and conducts trainings in accordance with these programs.

Training is a requirement of our employment and legal is an important part of our obligations.

Building the human resources of the future today necessary steps are taken to ensure compliance with the law for the welfare of our employees.

Compliance with the law for the welfare of our employees Beyond that, the wage set by the sector is the overtime wage, social benefits, working hours are organized and respected.

Our Responsibility

- Ensuring the professional and personal development of all employees deemed necessary for and requested by employees The trainings are carried out on a regular basis.
- All employees attend the trainings planned for them is obliged to attend.
- Fails to complete or is unable to complete the required training if it is late, the legal process is applied.
- The human resources of the future regulations of the Human Resources Department responsibility of all employees, but it is also the responsibility of and management support is expected.
- Priority is given to internal appointments for career development, advancements are prioritized.
- All employees are supported with social rights.
- Employee satisfaction surveys are conducted regularly. Suggestions and complaints received under the leadership of the HR manager, Attended by the General Manager and all department managers evaluated at the meeting. Topics are prioritized and action plan is created and communicated with all employees shared.

Harassment and Violence Free Workplace

Courtesy and respect are essential for a healthy work environment and are important aspects of the future of work. Work or work-related a respectful approach to everyone met through activities is treated as such. Any behavior of a sexual nature, considered harassing, intimidating, humiliating, offensive or intimidating, including unwanted attention no verbal, visual, physical actions that can be is not tolerated. At SEGER, the honor and dignity of all people is believed to deserve respect.

Our Responsibility

- Others are treated fairly and with respect.
- When someone is treated unfairly or disrespectfully SEGER employees are subject to the "Ethics Committee". must give notice.
- Hiring, dismissal, pay decisions, promotions or managers, who are responsible for employee

discipline, can only a person's qualities, abilities, experience, focuses on performance.

- All employees are committed to creating a good working environment and takes responsibility for maintaining it.
- Never harassment, bullying, workplace violence or threats that they may consider offensive or degrading behavior is not allowed.

Work - Human Health and Safety

SEGER's vision of human health and safety at work is zero is a work accident. With this vision, we aim to create a safe, healthy environment and its continuity. A proactive to prevent accidents and incidents by creating a safety culture measures are taken. Human Health and Safety, protect the well-being of our employees and ensure safe work environment. SEGER, mental health also attaching importance and supporting its employees in this regard. Presents. By regularly and continuously reducing risks, our processes are improved.

Our Responsibility

- Health and safety is everyone's responsibility.
- Contributing to a healthy, safe working environment responsibilities have been defined and include accordingly.
- All employees shall follow the emergency procedure related to their work and plans.
- All employees are aware of the Human Health and Safety receive regular training. Everyone should participate in these trainings mandatory.
- Each employee shall comply with safety instructions, observe personal must use and maintain their protective equipment.
- Safety instructions or protective measures report deficiencies or non-compliance is everyone's responsibility.
- If the work is considered unsafe, the employee will stop working exercise the right of abstention.

Confidentiality of Personal Data

All of us, our colleagues, our customers, personal data of our suppliers and other persons with whom we do

business information within SEGER. In SEGER even if the personal information is only what they need to do their job is shared with those who hear it. The information will not be shared necessary measures are taken to ensure non-disclosure. Privacy and data protection laws require that a person's private information integrity and confidentiality. SEGER complies with these laws acts accordingly.

Our Responsibility

- Confidentiality of all employees and everyone we do business with rights are protected.
- Personal data is used only for appropriate purposes.
- If personal information is used, all laws are complied with, SEGER policies and procedures must be followed.
- Minimum personal data only when necessary used and requested.
- The collected data is used only for its intended purpose.
- Personal data is not collected more than once.
- Collection, copying, storage of personal data, analyzed or disposed of only authorized employees.
- Employees who intentionally disclose or misuse personal information SEGER employee who uses it shall be held responsible and legally face sanctions.

Drug and Alcohol Free Workplace

When working for SEGER, no one is allowed to use drugs or under the influence of alcohol will not be tolerated. Our work requires alertness, sensitivity and quick reflexes. Illegal drugs, controlled substances, non-prescription the use of medicines is not allowed. Special prescription In the case of the use of medicines, the written permission of the company's doctor is obtained.

Our Responsibility

- A job free from the influence of drugs and alcohol these substances to ensure the continuity of the environment not brought to work, not used at work, not given to someone else or under its influence.
- Taking any special prescribed medication that may affect the work the company doctor is notified.

- If an employee is under the influence of these substances If believed, the manager is informed.

Human Rights

SEGER recognizes its responsibility to respect human rights is aware of this. In addition to SEGER's policies, the United Nations Universal Declaration of Human Rights, European Convention for the Protection of Human Rights and the International the basic principles of the Labor Organization and the World Health Organization conventions shall be respected.

Race, color, sex, language, religion, political or other opinion, national or social origin, birth or other status the freedom and equality of all people, regardless of their we are committed. Diversity is an important part of our daily work and culture is a part of it. We ask all our employees dignity, privacy and personal rights they are expected to show respect at all times. Under no circumstances tolerance of discrimination, harassment or abusive language is not shown. Forced and compulsory labor and child labor by being sensitive to the fight against we create awareness around us.

Our Responsibility

- No employee is allowed to directly violate human rights principles or any action that indirectly violates is unacceptable.
- All employees must treat everyone with dignity, respect and care. Treats and protects human rights.
- International declarations and rules on human rights is understood by all employees and appropriate is treated. In case of any ambiguity, the "Ethics Board" makes a statement.
- In case of human rights violations or non-compliance Ethics Committee is notified.

Moving Forward with Faith and Courage Respect and Contribution to the Environment

SEGER respects the environment and uses it for its sustainability activities to protect it. Under no circumstances We do not compromise on our environmental commitments. We are committed to

ensuring that our environmental actions and activities on the impact of the impact on the whole we respond openly and honestly to our stakeholders.

Our Responsibility

- In all our operations, we comply with environmental protection requirements meet or exceed the targets.
- Full compliance with laws and regulations.
- We reduce our energy use, GHG emissions, waste reduce our water footprint, reduce our water footprint, reduce our resource scientifically based to optimize our efficiency studies are carried out.
- We ensure that every employee is aware of to act in accordance with our goals.
- Each of our employees supports us with their behavior and ideas to achieve our goals regarding a sustainable environment.

Community Relations

SEGER is committed to being a good corporate citizen. We conduct our business in a safe and environmentally sustainable we are aware of our responsibility to execute in a way that works. Our work all laws, rules and regulations applicable to we act accordingly.

Women in society with Gender Equality awareness gives importance to work for development. For the welfare of society as a company that produces responsibly to contribute we continue our activities.

Our Responsibility

- Respect for community well-being, the environment and human rights We aim to ensure our continuity.
- Establishing a transparent and open dialog with our stakeholders and to create a culture of trust we work.
- We respect the customs and traditions of the society respect.
- We do not discriminate on the rights of minorities We work for the protection and development of the public.
- We work for social development that will contribute to the development of society. We support responsibility projects.
- We conduct our business and operations according to the issues prioritized by all stakeholders. We create our sustainability strategy.