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# WORKING PRINCIPLES - CODE OF CONDUCT INSTRUCTION

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## 1 GENERAL WORKING PRINCIPLES POLICY

### 1.1 Working Principles

1.1.1 All Kafein employees work for production and are responsible for making production better quality, faster and more economical. It is of great importance for us that our working principles and rules of conduct are in certain standards and compliance with them is of great importance for us.

1.1.2 All work-related activities are directly or indirectly related to the relevant legal regulations.

1.1.3 The dignity and integrity of Kafein as a corporation is only possible if its employees behave accordingly. For this reason, all of our employees are expected to take decisions and actions in accordance with the rules of work and behavior, in accordance with the rules of work and behavior, and to make correct and well-founded business and transactions.

1.1.4 If the management of Kafein reaches the conclusion that the actions and behaviors of its employees both in and outside the workplace have a negative impact on Kafein's corporate image and identity, interests, the employee's own performance or the performance of other employees, it may impose disciplinary sanctions that may result in termination of the employment contract.

All Kafein employees agree that the Kafein Disciplinary Policy is binding on them and that they have read and understood it.

1.1.5 It is always possible to access the policies, standards, procedures and instructions of the company. All Kafein employees are obliged to know and implement these regulations, and those in managerial positions are also obliged to have them implemented and to supervise their implementation.

### 1.2 Disciplinary Penalties

The following items are contrary to working principles. After two written warnings received from the employer or representative of the personnel related to the issues listed, the work may be terminated in accordance with Article 25 of the Labor Law No. 4857.

1.2.1 Failure to choose appropriate clothing for the working environment and the standards required by the job,

1.2.2 Long phone calls during working hours for personal purposes and to prevent work, Internet use, use of lq and similar instant messaging software, computer games

1.2.3 Listening to loud music in the workplace during or outside working hours, which may cause disturbance.

1.2.4 Speaking loudly in a way that causes disturbance in the workplace, using words against work discipline, insulting, humiliating, maligning, slandering, etc.

1.2.5 Visiting the office outside of working hours when not required by the job, spending time in the office and using the office facilities for their own purposes during this time (telephone, computer, fax, internet, etc.)

1.2.6 Provoking colleagues against the employer,

1.2.7 Borrowing money from friends in a way to put the company in a difficult situation or obtaining personal benefits from companies with which the company has relations.

1.2.8 Inability to do his/her job despite warnings.

1.2.9 Frequent absences or late arrivals at work, often with excuse notices.

### 1.3 Zero Tolerance

1.3.1 Kafein Employees may not give and/or receive bribes under any circumstances and conditions. Otherwise, it is considered as a sufficient condition for termination of the employment contract.

1.3.2 Employees are regularly trained/informed on business ethics.

1.3.3 A Kafein employee who detects a violation of business ethics is obliged to report it to his/her manager or the General Manager.

1.3.4 Kafein employees cannot give gifts with a monetary value of more than **500 TL** to the employees of the companies they do business with, and they cannot accept gifts with a monetary value of more than **500 TL** from the companies they do business with.

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1.3.5 Kafein employees are responsible for knowing and strictly complying with all laws and regulations regarding bribery, corruption and prohibited business practices.

## **2 OCCUPATIONAL HEALTH AND SAFETY POLICY**

### **2.1 Health and Safety Principles**

2.1.1 Kafein attaches great importance to its employees working in a healthy and safe environment. Managers are obliged to carry out company activities by considering the health, safety and physical working conditions of their employees.

2.1.2 Employees are also obliged to comply with laws and regulations and company policies regarding all health, safety and physical working conditions in the workplace.

2.1.3 Kafein monitors that the personnel working outside the office at the Customer location benefit from Health and Safety services.

### **2.2 Non-Alcoholic and Substance Abuse Environment**

2.2.1 Kafein aims to create a safe, effective and productive work environment for all employees. Our company aims to continue its activities in an environment free of substance abuse and alcohol consumption.

2.2.2 We know that substance abuse is a serious health problem. Substance and alcohol consumption during and outside of working hours can lead to wrong decisions, increased accident rates, illness, absenteeism and low motivation. At Kafein, substance and alcohol use during work and at the workplace is prohibited except for special events, hospitality and meetings with the approval of senior management.

2.2.3 Any employee who violates this policy in the circumstances described below will be subject to disciplinary action/penalties, up to and including termination of employment and referral to the appropriate legal authorities.

2.2.3.1 Illegal substances or controlled substances (narcotics)

2.2.3.2 Employees are prohibited from transporting, using, manufacturing, distributing, selling or purchasing illegal or controlled substances while on duty or in any company building or company vehicle.

2.2.3.3 Employees are prohibited from reporting to the company while under the influence of alcoholic beverages or consuming alcoholic beverages while on duty or in any company building or company vehicle.

2.2.3.4 Parties and events organized by Kafein on company premises and outbuildings are exempt. However, alcohol consumption by employees at such events is entirely voluntary and drinking should be reasonable and in appropriate quantities.

### **2.3 Smoking Policy**

2.3.1 Kafein is committed to providing a healthy and safe work environment within company buildings and/or areas. Smoking within company buildings, kiosks, warehouses and other areas other than those designated by the company management is prohibited.

2.3.2 This policy applies to all Kafein employees, external employees, contractor employees and visitors. Smoking is only permitted in places designated and authorized by the Administrative Affairs Department within the company. If a special place is designated for smoking within the company premises, smoking will take place outside the company building.

2.3.3 Unless otherwise stated, smoking may be permitted at company parties and other gatherings held in unenclosed areas outside the company building and/or grounds.

### **2.4 Occupational Safety, Health and Environment**

2.4.1 Managers and employees must exercise due care and diligence to ensure that the Company's activities continue in the healthiest and safest manner for employees and with the least impact on the environment.

2.4.2 Kafein workers must also exercise due care and attention at the different locations where they work.

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2.4.3 As a company, Kafein should recognize the occupational safety and health of its employees as a core value. As a company, it should prioritise the protection of nature and the environment and support and encourage its employees to be sensitive to the environment.

2.4.4 Kafein must implement comprehensive and continuous training and regular audits to ensure that environmental, occupational health and safety laws are learned and applied correctly.

### 3 EQUALITY PRINCIPLES POLICY

#### 3.1 Principle of Diversity, *Inclusion and Diversity*

3.1.1 Kafein values personal differences among employees. In particular, issues related to recruitment, training, development, transfer, promotion, performance evaluation and remuneration are carried out in accordance with this principle.

3.1.2 Valuing diversity should be a principle that is present in everything we do and in every decision we make. The company expects every employee to adapt their daily activities and behaviors to the standards of the environment they are trying to create.

**3.1.3 Kafein Teknoloji believes that diversity and inclusion is an important element in business life and that practices towards this should be encouraged. It aims to create a work environment where diversity is incorporated into the talent experience, where employees are always respected regardless of their background and perspective, and a company culture that supports inclusion. Diversity refers to all the differences that belong to people in general. Everything that makes people unique is part of the definition of diversity. Inclusion means putting the concept and practice of diversity into action by creating an environment of participation, respect and connection where the richness of ideas, backgrounds and perspectives are used to create business value.**

**3.1.4 Kafein values the differences of the people it works with and provides a working environment where everyone is respected and feels that they belong. Kafein is committed to equal opportunity in all its processes; recruitment, placement, development, training, remuneration and promotion decisions are based on the qualifications, performance, skills and experience of the employee. In this system, where performance and contribution to corporate success are recognized, cultural diversity and equal opportunity are encouraged. The presence of employees with different characteristics in the workforce who feel they belong to the organization is essential for the company to achieve its business goals. Therefore, efforts are made to attract, develop and retain open-minded talents with different backgrounds and experiences and who respect diversity. It aims to create an environment where employees feel valued and safe and are free to create and innovate.**

**3.1.5 In all relations with business partners and stakeholders, the Company places importance on collaborating with organizations that value equality and diversity. It considers diversity and inclusion as an area for improvement for both the company and society. With this in mind, it communicates the principles and practices of diversity and inclusion to its Business Partners and expects them to comply with these principles and practices.**

**3.1.6 Equal Opportunity and Diversity in Recruitment, Training Planning and Career Development**  
**The Recruitment Policy is based on giving importance to people and knowledge, objective evaluation and equal opportunity. Regardless of age, gender, race, color, language, religion, philosophical and political opinion, ethnic origin, economic status, health status, disability, appearance, lifestyle and clothing style, sexual orientation, the Company selects and hires employees based solely on their professional abilities and qualifications and supports them in revealing their potential. It supports selection and placement decisions with measurement and evaluation practices based on competence and ability, and observes equal opportunity.**

**It develops and implements programs to enable all employees to realize their potential by providing opportunities in education and career development in accordance with their needs. It takes into account the opinions and suggestions of all employees and supports a participatory**

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**culture by creating platforms where they can voice them. It invests in training and development and establishes collaborations in order to train qualified human resources for the sector. It equips its employees to manage diversity and inclusion. It opposes the use of sexist, racist, discriminatory language and behavior that reinforces stereotypes in all communication processes. It promotes open, fair, nonviolent forms of communication and adopts an egalitarian communication policy.**

**3.2 Behavior at Work**

3.2.1 All Kafein employees are obliged to behave in a manner appropriate to the workplace, to observe customary rules of courtesy and to treat others with respect, both in their contacts with their colleagues and with others who have business relations with our company. All employees must be sensitive to the views or values of those with whom they interact, in particular regardless of their religion, race, age, gender, nationality, citizenship, seniority or physical ability.

3.2.2 Employees are obliged to report to their supervisors any situations they feel are inappropriate and the company is obliged to encourage the fulfillment of this responsibility. Inappropriate and discriminatory behavior in the workplace may result in disciplinary proceedings, up to and including termination of employment or legal action. All disciplinary proceedings will be conducted in accordance with the Kafein Disciplinary Policy.

**3.3 Equal Employment Opportunity and Equal Treatment Principle**

3.3.1 Another objective of the company is to encourage and develop high performance and excellence in all activities. This means equal employment opportunities for all who share our principle of achieving excellence, regardless of religion, race, age, gender, nationality, citizenship, seniority, physical ability.

**Kafein does not discriminate on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity and expression, marital status, pregnancy, political affiliation or disability in hiring, performance evaluations, pay increases, and other employment practices.**

3.3.2 This principle applies at all stages of employment, including recruitment, placement, promotion, transfer, assignment of work, treatment of employees, wages or other rewards, selection for training, and termination of employment.

3.3.3 Our Human Resources policy and activity plans are organized in a way to help realize our principle of equal employment opportunity. For this to be realized, all employees must cooperate with the Human Resources Department.

**3.3.4 Ensuring gender equality, combating prejudices brought about by the concept of sexism, and strengthening the position of women in business life are among Kafein's focus target areas. The Company observes the balance between male and female employees. It pays special attention to pursuing strategies that promote the employment of women in managerial positions. Kafein offers opportunities and implements practices for women in order to encourage their participation in the workforce, facilitate their work/life balance and working life, and support their family life.**

**3.3.5 The Company has set a minimum target of 25% for the ratio of female members on the board of directors and makes maximum efforts to achieve and maintain this target. The board of directors evaluates the progress made in achieving these objectives on an annual basis.**

**3.4 Sexual Abuse**

3.4.1 Kafein is committed to providing all employees with a work environment free from any form of abuse. Employees are also responsible for maintaining a work environment free of sexual harassment. Unwelcome sexual advances, sexual demands and any verbal or physical behaviour that evokes sexuality are considered sexual abuse.

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3.4.2 Each employee is obliged to contact his/her immediate supervisor, a member of the management team and/or Human Resources Services immediately and within 7 days at the latest, as soon as he/she believes that he/she has been sexually abused or as soon as he/she becomes aware of an incident that constitutes sexual abuse. Reports that are not made within 7 days from the date on which the abusive act is declared to have occurred will not be taken into account.

3.4.3 As far as possible, the confidentiality of persons who have been sexually abused or who have been named in a complaint should be protected.

3.4.4 Employees who are sexually abused can contact the relevant person by phone, e-mail, etc.

### 3.5 Non-Violent Workplace

3.5.1 Violence or violent behavior in the workplace is strictly prohibited.

3.5.2 Any violent behavior, physical injury, abuse or intimidation by employees in the Kafein workplace will not be tolerated. Anyone who engages in such behavior will be subject to immediate disciplinary action, up to and including termination of employment. The employee may also be personally liable for civil or criminal penalties. All violent behavior or acts will be thoroughly investigated by management.

3.5.3 For the purpose of this policy, violent behavior is defined as follows:

- An insult or indirect threat of harm directed at this person,
- Possession of weapons within the Company premises, vehicles or on Company's business.
- Engaging in loud, angry, threatening or damaging behavior that is incompatible with the work environment
- Disturbing or threatening phone calls
- Surveillance or stalking in a harassing manner.
- Intentional damage or threat of damage to company property or anyone else.

3.5.4 Any employee who observes or has knowledge of any act of violence or is subjected to threatening intimidating behavior is obliged to immediately report the matter to his/her manager or the Human Resources Services manager.

### 3.6 Dress Policy

3.6.1 It is of utmost importance to protect and maintain the company and/or customer image of the employees working within Kafein, staff working in Kafein office and/or customer location.

3.6.2 Personal appearance and attire is a personal matter. However, it is necessary to protect the business image very well.

3.6.3 Kafein Personnel should always present a professional and businesslike appearance during working hours.

3.6.4 Employees are required to present a professional and businesslike appearance to customers and the public at all times. Clothing other than traditional dress standards will not be permitted.

3.6.5 Employees must present a clean, neat and appropriate appearance for their position.

3.6.6 Male employees may wear so-called business attire at work. This includes polo-neck shirts, clean and neat jeans, sneakers, jackets and similar clothing.

3.6.7 For female employees, they may wear so-called business attire. Within this definition, miniskirts, strapless dresses, transparent dresses, tight blouses and stretch pants and other revealing clothing should be avoided.

3.6.8 Employees should not wear open clothes, tracksuits, shorts, sandals, collarless t-shirts, slippers and daily clothes such as ripped and old jeans that do not provide a suitable appearance for work.

3.6.9 Employees who may be required to attend such meetings at any time due to their duties where there will be participants from outside the company and/or personnel working at the customer location must wear formal attire and display an appearance appropriate to their business needs.

3.6.10 The dress code policy described above applies to all personnel.

3.6.11 Comfortable clothes may be preferred only on Friday, one of the working days of the week, so as not to disrupt the working order and integrity.

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3.6.12 Personnel who need to make a physical effort, workers in the field and employees who are in contact with outside visitors may wear casual clothing appropriate to their duties, provided that they obtain permission from their managers.

**3.7 Code of Respect, Honor and Dignity**

3.7.1 Behave with dignity, honor and honesty in all business relationships.

3.7.2 While fulfilling their responsibilities, any personal behavior and attitude that may damage Kafein's reputation should be avoided.

3.7.3 There should be no violation of equality and respect for women and men, and no violation of public morality and socially accepted moral behavior.

3.7.4 Laws, statutes, regulations and by-laws must be known in detail and adhered to in matters related to the duties.

3.7.5 Confidential information within the Company must not be disclosed to third parties other than those who need to know.

3.7.6 In case Kafein employees are faced with any disrespect within the company, they should contact the HRM manager to report and complain about the issue. The HRM manager has the authority to directly request information, documents and evidence related to the investigation. The complaint can be made by phone, e-mail or verbally.

3.7.7 The investigation should be conducted in as confidential a manner as possible. In addition, confidentiality should be waived where necessary to avoid any injustice.

**4 INFORMATION SECURITY AND CONFIDENTIALITY POLICY**

**4.1 Trade Secrets and Confidentiality**

Kafein employees are obliged to protect the confidential information belonging to the company that they are authorized to access in connection with their work with utmost care and not to disclose or cause to be disclosed in any way. How to disclose this information is regulated in the Confidentiality Policy and Information Security Policies. In case of improper disclosure of company information, the employee will be prosecuted in accordance with Kafein Disciplinary Policy.

Everyone who accepts to work at Kafein also accepts the principle of protecting company assets and not disclosing trade secrets to third parties under any circumstances. Employees accept, declare and undertake that this obligation will not end when the employee leaves the company and will remain binding regardless of the reason for the termination of the service relationship.

Every information belonging to the company is valuable.

During their employment with the company, employees have information about the company's structure, activities, assets and new projects. If this information is openly shared with the public, it is generally called 'TRADE SECRET' and is 'CONFIDENTIAL'. Keeping information confidential is a legal obligation and a legal and moral responsibility of all employees.

Although it is not possible to summarize trade secrets in a list, in summary, all information belonging to the company that cannot be disclosed to the public or that has not been notified in writing by the senior management of the company that there is no harm in its disclosure should be considered within the scope of trade secrets.

All employees are responsible for ensuring that documents and/or other materials containing trade secrets are kept away from unauthorized persons and securely protected.

Some information may need to be disclosed during negotiations with contractors etc. In such cases, each employee must obtain verbal and/or written opinion or permission from the manager or Senior Management.

In relations with companies, confidentiality agreements should be made whenever necessary. However, even with companies with which confidentiality agreements are made, information should be shared in accordance with the purpose and limited to the purpose.

It is the duty of every employee to keep information confidential from anyone other than responsible persons, including company employees. Other employees are also obliged to respect this.

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During the repair or disposal of company computers, the confidentiality of all information contained in them is essential. Portable computers allocated by the Company must be encrypted.

All employees are obliged to comply with the Information Security Policy and Procedures to ensure the security of electronically stored information.

A former employee who has left the company may enter the company premises only as a visitor and in this case, he/she has the physical access rights specified in the Physical Security Documents published. A former employee who has left the company cannot access places outside of these access rights (e.g. office floors, etc.) and cannot be given any information about the company.

Accidental disclosure of trade secrets can be as harmful as intentional disclosure. For this reason, these secrets should not be mentioned to anyone other than the employee who will benefit from this information during the conduct of business.

All company activities are subject to competition. For this reason, all employees are obliged to prevent our business resources from being given to other people due to carelessness or intentionally, and to prevent them from being used against Kafein.

Company employees are obliged to consult their manager if they have any doubt whether the information they have is confidential or not; in case of doubt, they are obliged to act by accepting that it is 'confidential'.

All kinds of information belonging to the Company, employees, suppliers and customers are confidential information, and in case of doubt, it is expected to accept that the subject is 'confidential information'.

#### 4.1.1 Obligation of new employees

It is Kafein's policy not to use the confidential information of others unless properly authorized.

Employees who worked for a competitor before working at Kafein are responsible for protecting the information of their former company and not using that information while working at Kafein.

They may not bring any documents from their former company(ies) onto Kafein premises.

Cannot use any confidential information belonging to his/her former company/companies in his/her work at Kafein.

Cannot disclose or offer to disclose any confidential information belonging to his/her former company(ies) to Kafein employees.

Company employees should not ask new employees to disclose confidential information from their former company(ies), unless the employee's former company has expressly authorized disclosure of the information in writing in advance.

#### 4.1.2 Liability in case of leaving the company

The legal obligation not to use or disclose the Company's Proprietary Confidential or Restricted Information does not end upon the employee's termination of employment.

The employee must not take documents with him/her, including documents produced during his/her continued employment with the company.

Former employees who fail to comply with these restrictions will be legally liable to the company.

If the former employee has any questions about this obligation, they should contact their former manager or the new manager in the former manager's position.

#### 4.2 Public Announcements

4.2.1 Information that is about to be disclosed to the public for various reasons but has not yet been disclosed to the public is confidential until a public announcement is made by the company.

4.2.2 An employee in possession of such information has an obligation not to disclose it until the information is made public.

4.2.3 Employees who have doubts about whether the information they possess should be disclosed to the public are responsible for seeking the opinion of their manager on the matter.

#### 4.3 Important Information

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4.3.1 Although it is not possible to define the concept of 'important information' in a way that will be valid in all situations that may arise, information that has the possibility of affecting our customers' preferences and decisions falls within the scope of 'important information'. 'Important information' can also be defined as information that is urgent at the time.

4.3.2 In this context, information that may be considered "important" includes financial forecasts, new products and strategies, significant management changes, various agreements, litigation or legal proceedings to which the company is a party, and financial results.

4.3.3 Any information that significantly affects the reputation of our Company is classified as "Important Information".

#### **4.4 Employee Privacy**

All employee information is kept in locked cabinets.

#### **4.5 Information Security Obligations**

All employees must fulfill their information security obligations in light of the information communicated to them.

#### **4.6 Confidentiality of Communications**

4.6.1 Kafein provides services that are confidential due to its field of activity. Violating this confidentiality may result in very serious criminal and administrative sanctions for both the company and the employee responsible. It is the primary responsibility of all employees to protect the confidentiality of all communications and information of our customers.

4.6.2 No employee may intervene in, listen to or observe any conversation between customers or make any statement or explanation.

4.6.3 Unless permitted by law or unless the proper course of business requires it, no information or recordings of customer conversations may be given or disclosed to others. It cannot be shared with other employees other than those who are required and obliged to know as a business necessity.

4.6.4 We will not review or disclose any information about our customers' conversations or information processing arrangements without a valid business reason. This includes unpublished telephone numbers, billing, network or equipment information.

4.6.5 Except for the decisions given by the court or competent authorities, no interview information or personal information of any customer may be disclosed to any person or institution other than the competent authorities. Except for the approval of the Legal Advisor, no action can be taken in this regard with the information and approval of any person or institution.

### **5 ETHICAL WORKING PRINCIPLES POLICY**

#### **5.1 Improper Use of Company Assets**

5.1.1 Kafein owns a variety of assets, many of which are critical to the company's competitive capacity and success. These include our physical assets as well as intangible assets, intellectual property rights, brand, brand image and confidential information that are extremely valuable to us. It is important to protect all these assets. Their loss, theft or misuse could jeopardize Kafein's future.

5.1.2 It is the personal responsibility of each employee to protect and help protect company assets entrusted to company employees. In accordance with this responsibility, every employee must be careful against any situation or event that may cause the loss, theft or misuse of company assets. Any employee who becomes aware of such a situation is obliged to immediately report it to his/her manager or Human Resources Services.

5.1.3 Physical assets such as equipment systems, facilities, stationery, etc. must only be used for Kafein's business or for purposes authorized by Senior Management.

5.1.4 Company assets may not be used, directly or indirectly, for any illegal payment or for the interests of any legal entity or employee with whom the company does business, whether official or not, directly or indirectly in the form of gifts or donations of any kind. Employees who behave otherwise will be dealt with

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in accordance with the Kafein Disciplinary Policy. In addition, if the act constitutes a criminal offense, legal action will be taken according to the relevant legislation.

5.1.5 Unless prohibited, normal sales promotional items bearing the company's name or items that do not carry significant value or other meaning, such as flowers or chocolates, may be given to customers and customers' employees.

5.1.6 Employees are prohibited from engaging in unethical national/international trade, business and transactions with a local and/or foreign official, political party or candidate for political office through any offer or payment of any value that could influence their actions to breach the obligations of such person or to obtain or retain any commercially (legally) improper benefit.

5.1.7 This includes all state-owned or state-managed organizations and enterprises.

## 5.2 Conflict of Interest

The main principle of conflicts of interest is to ensure that employees avoid situations in which their personal interests conflict or appear to conflict with the interests of the company.

Kafein does not interfere in the private lives and affairs of employees unless it negatively affects their duties in the company. However, all employees who start working in our company or undertake a certain task also accept certain obligations. Therefore, it is essential for employees to protect the interests of the company first. 'Personal interests cannot override company interests'

Company employees should avoid not only situations where there are obvious conflicts of interest, but even situations that may give the impression of such conflicts. The existence of a conflict of interest should be recognized in ambiguous situations that require interpretation. The information on the following pages is intended as a guide to important areas where conflicts may arise, and examples are not limited to these.

It is the responsibility of each employee to act in accordance with these general principles on conflicts of interest.

Detailed information on this policy is provided below

### 5.2.1 Relations with Vendors and Competitors

5.2.1.1 It is essential to act in the best interests of the company in the selection of contractors, customers and other persons and organizations and in relations with them.

5.2.1.2 From time to time, it is inevitable that our employees will meet and talk with our competitors and attend the same industry or company meetings. Our employees must not discuss pricing policies, contract terms, marketing plans, any confidential company information or generally any anti-competitive practices in any discussions with our competitors.

5.2.1.3 None of our employees may accept any payment, remuneration or loan, directly or indirectly, from persons or organizations that are in competition with our company. However, it is not contrary to the above rule for employees to receive remuneration from some works that will not affect the impartial performance of their duties in the company and that they carry out with the approval of the company, or to borrow money from a financial institution at normal interest rates.

5.2.1.4 Employees may not accept gifts (giveaways), hospitality and similar treats from any person or organization that does or intends to do business with the company or that should be considered within this scope, implying that they are given in return for work. Giveaways given by customers, suppliers and other persons may be accepted provided that their value is not more than **500 TL** provided that they are not given for the purpose of incentivizing the employee and do not constitute any compensation for business purposes. These giveaways may include gifts, gratuities, food, beverages and entertainment.

5.2.1.5 Employees may not enter into any other commercial relationship with other companies, dealers or third parties with which the company has a relationship for their personal purposes, and may not act as an intermediary on behalf of their relatives or relatives with a privilege arising from their duties, positions or status in the company, even if not on their behalf. Employees are obliged to inform their manager and/or human resources if they are faced with any situation that suggests a potential violation

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of this code of ethics and are not sure what to do in that situation. Violation of this code may lead to disciplinary action, up to and including dismissal.

**5.2.2 Relations with Other Companies and Our Responsibilities**

5.2.2.1 No employee of the Company may directly or indirectly profit from an organisation that does business with, is considering doing business with or competes with the Company.

5.2.2.2 None of our employees may work as a manager, consultant or employee in a for-profit organization that works, intends to work or competes with our company without the company's specific permission.

5.2.2.3 Employees who have prior knowledge due to their employment with the Company may not own, directly or indirectly, any real estate, company shares or similar property that the Company plans to own.

5.2.2.4 All employees have an obligation not only to compete vigorously and efficiently, but also to compete lawfully and ethically in the course of their work, especially when engaged in marketing and sales.

5.2.2.5 Kafein sells by emphasizing the qualities of its products. It is not appropriate to provide false or misleading information about competitors and their products or services. All employees are obliged to refrain from such actions, as such behavior will only cause us to lose the respect of our customers, receive complaints from our competitors and negatively affect our corporate reputation. Negative behavior of competitors cannot be used as an excuse in any way.

5.2.2.6 All comparisons with our competitors and their products and services must be supported by evidence. They must always contain complete and accurate information and must not be misleading.

5.2.2.7 The collection, receipt and use of information about the market in which we do business, including information about competitors and their products and services, must comply with all legal requirements. In case of doubt, support should be sought from Legal Counsel with the knowledge of the manager.

**5.2.3 Relations with Relatives**

Employees are prohibited from entering into a business relationship on behalf of the company with their relatives or with an organization with which they or their relatives are associated, except where the company provides written consent upon written request.

**5.3 Political Aid and Aid Given to Public Officials**

5.3.1 Company employees may not use company resources for political contributions.

5.3.2 Any payment to any political party or political party official, a political association and its officials or political candidates shall be deemed to be the use of the company's assets, employees or services within the concept of 'Political Aid'.

5.3.3 Any payment made for the purpose of influencing the conduct or decisions of a public official or inducing a public official to use influence to influence official decisions is also objectionable and prohibited.

5.3.4 The term 'payment' includes any direct or indirect transfer of money or any offer of benefit, whether made directly or indirectly through trade associations, agents, consultants or others, and gifts in excess of the concept of giveaways. The term 'public official' means an official working in government or state, public institutions and organizations.

5.3.5 The assets of the Company may not be used directly or indirectly for political promotion purposes in any official, legal or illegal manner. The term political incentive includes all activities that directly or indirectly benefit a political segment, party, board or organization, such as official visits, dinners, lotteries of goods or monetary aid or gifts.

5.4.6 Employees are prohibited from directly or indirectly offering, promising or giving benefits to officials of public institutions or organizations elected or appointed in the country of residence or in a foreign country, carrying out a legislative or administrative or judicial function, or to officials of international organizations established by states, governments or other international public organizations, regardless

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of their form of organization and field of duty, or to those performing international duties in the same country, for national and/or international commercial transactions, for the purpose of performing or not performing a job or obtaining or retaining an unfair advantage.

5.4.7 According to applicable Laws and Regulations, it is prohibited for the company, its representatives or employees to make payments or offer anything of value to government officials, officials and political party or party officials in order to obtain business or benefits on behalf of the company, or to induce them to help the company or to provide benefits.

5.4.8 This section is not intended to limit or in any way prohibit the personal political activities of Kafein employees. In case of doubt, a letter approved by the General Manager should be obtained from the responsible person of the company.

**5.4 Child Labor**

5.4.1 It is forbidden to employ children under the age of fourteen at Kafein.

5.4.2 Kafein may only employ children over the age of fourteen in areas that are beneficial to their development.

5.4.3 The safety, health, physical, mental and psychological development, personal predispositions and abilities of children and young workers shall be taken into account in the placement and employment of children and young workers.

5.4.4 A child’s work cannot prevent him/her from attending school or continuing his/her vocational training.

5.4.5 The working time of schoolchildren during the schooling period may be a maximum of two hours a day and ten hours a week, outside school hours.

5.4.6 During periods when the school is closed, working hours may not exceed the above-mentioned periods.

5.4.7 If a child laborer is found to be working in any way;

5.4.7.1: Kafein is obliged to terminate the situation as soon as possible.

5.4.7.2: If the financial situation of the family of the child to be dismissed is very critical, Kafein must hire another member of the family through necessary intermediaries.

5.4.7.3: Kafein will provide the necessary financial support to ensure the child’s continued education, cooperating with foundations and other organizations if necessary.

5.4.8 Which of the above actions will be taken is selected on a case-by-case basis with the initiative of the HR Director. The relevant HR Director is responsible for the follow-up of this nonconformity and **the Corrective and Remedial Actions** required for its elimination. The Director is obliged to follow up this situation until the nonconformity is closed completely.

Any employee who detects any non-compliance with the above items in any way is obliged to report the situation to the Human Resources Director.

**5.5 Compulsory and Involuntary Labor**

5.5.1 Kafein will not employ any type of forced or involuntary labor.

5.5.2 Kafein will not use prisoner labor or forced labor.

5.5.3 Kafein employees have the right to leave Kafein at any time in accordance with applicable labor laws.

5.5.4 Kafein shall not claim compensation in the event of termination of employment in its employment contract with its Employees.

5.5.5 Kafein shall not be used in a manner that prevents employees from fulfilling their human needs.

5.5.6 Kafein will not engage in any behavior that prevents employees from fulfilling their religious needs.

5.5.7 Kafein will not engage in any behavior that prevents employees from fulfilling their human needs and acting freely.

5.5.8 Kafein will not engage in any behavior that will prevent its employees from receiving the full/complete wages they deserve as a disciplinary practice.

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## 5.6 Values, Records and Accounting Procedures

5.6.1 All legal books, records and accounting procedures of the Company must comply with the laws of the Republic of Turkey and generally accepted International Accounting Principles.

5.6.2 A Company employee may not, in any way and for any reason, include false or fraudulent information in the records.

5.6.3 No employee may engage in activities that may cause false or fraudulent information to be recorded in the ledger.

## 6 WORKING HOURS POLICY

### 6.1 Working Hours

6.1.1 In our company, the weekly working time is forty-five hours and is equally divided into working days and the principle of flexibility in working hours is applied between 08.00-17.00 or 09.00-18.00 starting and ending hours, eight hours a day. Employees are entitled to a flexible one-hour lunch break (intermediate rest) to be taken between **12.00-13.00**. The break is not counted as working time.

6.1.2 Working hours are 45 hours per week. Kafein is free to divide this 45-hour working period into working days, to determine the starting, resting and ending times of the daily work, and to determine the week vacation of the personnel for 24 hours without interruption, with the condition of allowing one day off.

6.1.3 The working week is 6 (six) days.

6.1.4 On a daily basis, the working time cannot exceed the total daily working time stipulated by the Labor Law No. 4857 in any way whatsoever.

6.1.5 Kafein employees are required to comply with the working hours specified in their employment contracts or the working hours and discipline of the companies to which they are assigned.

6.1.6 The times when Kafein personnel are required to work are the times excluding weekends and general holidays.

6.1.7 The law determines how the worker will work and how much he/she will be paid for this work on weekends and general holidays when the work exceeds 45 hours per week.

## 7 LEAVE REGULATION POLICY

### 7.1 Annual Leave Right

#### 7.1.1 Leave Duration

Personnel are entitled to annual leave when they complete their first year in line with the following information.

According to months worked;

1-5 years : 14 working days

5-15 years : 20 working days

15 years-more: 26 working days

#### 7.1.2 Leave Entitlement

If the employee quits or is dismissed within the first year, the right to leave does not arise according to the legal provisions.

#### 7.1.3 Annual Leave Pay

In the event that the employment contract is terminated for any reason, the wage of the relevant employee for the annual leave periods that he/she has earned for that year but has not yet used shall be paid to him/her at the wage on the date of termination of the contract.

Except for this scope, annual leaves not used during the year cannot be converted into money.

### 7.2 Use of Annual Leave Rights

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7.1.1 Annual paid leave may be used in whole or in parts according to need, at times to be determined by the employee and his/her manager. Pursuant to Article 53. 2 of the Labor Law, the right to annual paid leave cannot be waived.

Annual paid leave rights are not paid by converting them into cash.

It is essential for our personal health, motivation and work efficiency that annual paid leaves are used efficiently by all employees, that time is allocated for vacation and rest, and that work and life balance is observed.

7.1.2 Pursuant to the Labor Law, it is essential that all annual paid leave is used within the same year.

The part of the leave of the relevant year that the employee cannot use for personal reasons can also be used in the following year.

However, leave rights not used by the employee in the following year are forfeited.

It is essential that annual paid leaves are made available by the Company.

In the event that compelling necessities arise in the workplace during that period, the leaves that have not yet been used by the employee in that year but are planned can be protected by transferring them to the following year upon the request of the Company and with the consent of the employee, and they will be used in the following year.

7.1.3 Pursuant to Article 56 of the Labor Law, annual paid leave is granted by the employer in an indivisible and continuous manner. However, upon the request of the employee, a part of the annual paid leave may be divided into a maximum of three, not less than ten days. Annual paid leaves are planned among the employees and managers in each business group of the company in accordance with this provision at the beginning of each calendar year until the end of May at the latest and used within the framework of these plans.

When annual paid leaves are used, the relevant leave approval forms and messages are shared with the relevant manager and HR department.

The relevant business group managers are in charge and responsible for observing and ensuring these issues.

7.1.4 At the end of each year, annual leave schedules are prepared by the Human Resources department and the leaves used during that year are recorded by taking the controls of the employees and the approvals of the managers.

7.1.5 Other paid leave (administrative leave for reasons such as birth, marriage, death of relatives, etc.) and unpaid leave or rest or sick leave granted to employees during the year shall not be offset against annual paid leave.

7.1.6 National holidays, general holidays and week holidays that coincide with the annual paid leave period shall not be counted from the annual paid leave period.

7.1.7 As a general rule, annual paid leave is granted to an employee who has worked at the workplace for at least one year.

However, an employee who has started work within that year shall be granted leave in the amount of days to be calculated proportionally based on the start date of employment, provided that he/she requests it upon request and provided that a planning is made so as not to disrupt the company's business.

### 7.3 Marriage Leave

It lasts for three days and is used at the time of marriage.

### 7.4 Maternity leave

It is sixteen weeks, eight weeks before the birth and eight weeks after the birth. In case of multiple pregnancies, a two-week leave period is added to the 8-week leave before delivery.

In addition, upon the request of the employee, up to six months of unpaid leave is granted after the completion of the paid maternity leave period mentioned above.

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This period is not taken into account in the calculation of annual paid leave entitlement. However, if her health condition is suitable, with the approval of the doctor, the female employee may work at the workplace up to three weeks before the birth if she wishes.

In this case, the periods worked by the female worker shall be added to the postnatal periods.

**7.5 Breast-feeding Leave**

Female employees are granted a total of one and a half hours of breast feeding leave per day to breastfeed their children under one year of age. The employee determines the hours between which this period will be used and how many times it will be divided. This period is counted as daily working time. The employee and his/her manager may also jointly determine the days and hours of the week and the number of hours to be used for this period.

**7.6 Death Leave**

Employees shall be granted three days' leave in the event of the death of their parents, spouse, siblings or children and one day's leave in the event of the death of other relatives.

**7.7 Leave for Seeking New Jobs**

In the event of termination of the service contract, our company gives the employee in question the leave for seeking a new job necessary to find a new job during working hours and without any wage deduction. The duration of this leave for seeking a new job to be given upon the request of the employee is two hours a day and the employee may combine the leave for seeking a new job hours and use them collectively if he/she wishes. However, the employee who wants to use the leave for seeking a new job collectively must coincide it with the days before the day he/she will leave the job and notify the company of this situation.

**7.8 Unpaid Leave**

In cases of extraordinary need, the employee may be granted unpaid leave for a period not exceeding six months upon his/her request and with the approval of the relevant group manager and human resources manager, provided that such leave is to the extent permitted by the business and provided that wage leaves and administrative leaves are used first.

**7.9 Miscellaneous**

7.9.1 The days (limited to ninety days) during which the employee is absent from work for maneuvers other than active military service or for any lawful assignment shall be deemed to have been worked in terms of annual leave.

7.9.2 The days when the employee cannot go to work due to an accident or illness (if the Health Board determines that it is inconvenient for him/her to work at the workplace) are considered as if he/she had worked in terms of annual leave.

7.9.3 This regulation is executed within the framework of the provisions of the Labor Law and the relevant legal regulations. The provisions of the Labor Law and the relevant legal regulations shall apply to the matters not included in this regulation.

7.9.4 For short-term illnesses of up to two days, employees may not continue to work by informing the relevant manager and the Human Resources unit. For short-term illnesses between three and seven days, medical leave may be granted provided that it is documented by a private doctor or Workplace Physician report other than SSI, and it is taken into account as days worked in wage payment. Reports indicating that the employee is unable to rest or continue working for more than seven days must be obtained from the SSI Health Board and must be submitted.

**8 WAGE AND FRINGE BENEFITS POLICY**

**8.1 Wage Payment**

8.1.1 As a rule, the employee's wage written in the contract is paid to him/her against signature or deposited into his/her bank account.

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8.1.2 It may also be paid to a trustee designated by the worker upon his written request and whose signature is affixed to the request.

8.1.3 As a rule, the date of payment of the worker's wages is the first working day of each month. Unless there is a force majeure event, wages shall be paid no later than 5 days after the due date.

**8.2 Overtime**

8.2.1 Work exceeding 45 hours per week under the conditions set out in the law is referred to as "overtime".

8.2.2 In order to be able to work "overtime", the written consent of the employee is obtained every year in advance with the "Overtime Consent Form" in the employment contract for employment.

8.2.3 "Overtime" payments are as follows:

- a) On normal working days, the wage for each hour is 50% more than the normal working rate,
- b) 100% more than the normal working wage on public holidays and weekends.

8.2.4 If the employee wishes, he/she may use one hour and thirty minutes for each hour of overtime work as free time instead of the increased wage for overtime work. The employee shall use the free time within six months, within the working hours and without any deduction from his/her wage.

8.2.5 The total number of overtime working hours cannot exceed 270 (two hundred and seventy) hours in a year.

**8.3 Right to Association**

8.3.1 Every employee has the right to association to protect his/her interests.

8.3.2 Employees and employers shall have the right to organize without prior authorization in order to protect and promote the economic and social rights and interests of their members in labor relations.

8.3.3 Employees and employers have the right to establish organizations of their choice without any discrimination and without prior permission. However, they must comply with the statutes of these organizations.

8.3.4 The term 'association' means any body of employees and employers which seeks to serve and defend the interests of employees and employers.

8.3.5 Kafein employees have the right to organize within the framework of the law.

8.3.6 Kafein employees have the right to raise issues related to their rights and interests with their higher authorities.

8.3.7 The Company supports the effective recognition of the right to freedom of association and collective bargaining.

**8.4 Private Health Insurance**

8.4.1 Personnel are provided with private health insurance in accordance with the provisions of the bylaws. However, the employer determines the scope and company of the health insurance. Nevertheless, the employer is free to amend the provisions of the bylaws.

**8.5 Rights to be Applied Before and After Pregnancy**

8.5.1 In Kafein, it is essential that female employees are not employed for a total period of sixteen weeks, eight weeks before and eight weeks after childbirth. r. In case of multiple pregnancies, two weeks are added to the eight-week period before the birth. However, if her health condition is suitable, with the approval of the doctor, the female employee may work at the workplace up to three weeks before the birth if she wishes. In this case, the periods worked by the female worker shall be added to the postnatal periods.

8.5.2 The periods stipulated above may be increased if necessary before and after the birth according to the health condition of the employee and the nature of the work. These periods shall be specified by a doctor's report.

8.5.3 During pregnancy, the female worker shall be granted paid leave for periodic check-ups.

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8.5.4 If deemed necessary by a physician's report, the pregnant female worker is employed in lighter work suitable for her health. In this case, the wage of the worker shall not be reduced.

8.5.5 Upon request, the female worker shall be granted unpaid leave for up to six months after the completion of the sixteen-week period or after the eighteen-week period in case of multiple pregnancies. This period is not taken into account in the calculation of annual paid leave entitlement.

8.5.6 Female employees are granted a total of one and a half hours of breast feeding leave per day to breastfeed their children under one year of age. The employee determines the hours between which this period will be used and how many times it will be divided. This period is counted as daily working time.

## 9 QUESTIONS AND CONSULTATION

### 9.1 Reporting Violated Rules

9.1.1 Any employee is obliged to immediately notify his/her immediate supervisor, the Head of Corporate Security Department and Human Resources Services when he/she becomes aware of any violation or potential violation of the rules or principles.

9.1.2 It is preferable that the person reporting a breach introduces himself/herself.

9.1.3 The Company immediately investigates all allegations of violations. These will be kept confidential to the extent permitted by legal obligations. The investigation will be conducted in accordance with the Kafein Investigation Policy and the decision of the Management Team.

9.1.4 Employees are obliged to assist in the investigation of alleged violations. If the investigation reveals a need to take remedial action, the company will decide what steps to take to resolve the issue, including legal action, and ensure that the incident does not recur.

### 9.2 Reporting Breach of Confidentiality Provisions

In case of any violation of confidential provisions or any suspicion or breach of confidential provisions or zero tolerance principles, or in case of a need to report or obtain information, an [e-mail](mailto:gizli@kafein.com.tr) can be sent to [gizli@kafein.com.tr](mailto:gizli@kafein.com.tr). Any **e-mail** received at this address will only be seen by the person assigned with special authorization and will never be shared with other persons, and if it is shared, the incident will be analyzed by reserving personal data.

## 10 APPROVAL / AUTHORIZATION

**General Manager and Human Resources Directorate**

## 11 CONTACT

Contacts for general questions and concerns regarding the code of conduct and working principles:

- Kenan Subekci
- Neval Önen

Email address to contact for confidential inquiries and concerns : [gizli@kafein.com.tr](mailto:gizli@kafein.com.tr)

**Note:** Any information, questions and concerns sent to this **e-mail** address will be protected by confidentiality principles.

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