TATLIPINAR ENERGY
PRODUCTION INC.

ETHICS AND COMPLIANCE POLICY

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1. CORE VALUES

As Tatlıpınar Renewable Energy, as an energy company operating on a global scale, we take the universal declaration of human rights as our guide and adopt an understanding that respects human rights in the societies in which we operate. Being aware of our responsibilities towards our customers and society, we accept as a basic principle to provide a positive and professional working environment for our employees.

2. WHY AND FOR WHOM ARE OUR ETHICAL PRINCIPLES?

Nowadays, the importance of ethical values in the business world and society is increasingly emphasized. Ethical principles go beyond a business or institution acting solely for the purpose of making a profit.

2.1. Why are Ethical Principles Important?

Building Reputation and Trust: Acting in accordance with ethical values creates and strengthens the reputation of a business or institution. Customers, suppliers, investors and other stakeholders have more trust in a business that acts in accordance with its ethical principles.

Long-Term Success: Ethical behavior enables focusing on long-term success rather than just short-term gains. To create a sustainable business model, businesses must adopt and implement ethical principles.

Social Responsibility: Businesses are responsible as a part of society. Acting in accordance with ethical values should be seen as a way to contribute to the welfare of society.

Who Does It Apply To?

Employees: Employees want to work in an environment that complies with ethical values at work. An ethical culture increases employee motivation, strengthens their commitment and increases business efficiency.

Customers and Consumers: Customers want to be sure that a business behaves ethically. Unethical behavior damages customer trust and reduces customer loyalty.

Suppliers and Business Partners: It is important for businesses to establish ethical relationships with suppliers and business partners. Unethical behavior damages trust between business partners and negatively affects business relationships.

Investors and Shareholders: Investors and shareholders want to be sure that the company acts in accordance with ethical values. Unethical behavior can cause investors and shareholders to lose confidence and negatively impact the company's financial performance.

Society: Businesses are expected to fulfill their social responsibilities. Behaviors in line with ethical values increase the welfare of society and generally create the image of a socially responsible business. As a result, ethical principles are a fundamental requirement of businesses and institutions. These principles are important not only in business but also for the general well-being of society. Acting in accordance with ethical values ensures long-term success, reliability and social responsibility.

3. OUR PRINCIPLES AND POLICIES

3.1. Respect for Human Rights

İnsan haklarına saygı, şirketimizin temel değerlerinden biridir. Bu kapsamda, her çalışanın eşit haklara sahip olduğuna inanırız ve bu hakların korunması için gerekli önlemleri alırız. Hiçbir şekilde ırk, cinsiyet, yaş, din, etnik köken, cinsel yönelim veya diğer herhangi bir ayrımcılık unsuru temelinde işe alım, terfi, eğitim veya diğer işlemlerde bulunmayız. Ayrıca, çalışanların özgürlüklerini, mahremiyetlerini ve kişisel dokunulmazlıklarını koruruz ve herhangi bir taciz veya kötü muamele durumunda gerekli adımları atarız.

3.2. Compliance with Law

Legal Compliance: As a company, we ensure full compliance with applicable laws in all our activities. Conducting business in accordance with legal regulations is a fundamental requirement to protect the safety and reputation of both our company and our employees. Therefore, it is expected that each of our employees understands the legal requirements and acts in accordance with them. Necessary legal actions will be taken against anyone who violates legal responsibilities or engages in behavior that is not in compliance with the law.

3.3. Prevention of Conflicts of Interest

Our company places great importance on preventing conflicts of interest. We establish policies and procedures to ensure that our employees perform their duties in an impartial and honest manner. Employees should prioritize the company's interests over their personal interests. In the event of any conflict of interest, we have a policy of transparent reporting and taking necessary actions.

3.4. Occupational Health and Safety

The health and safety of our employees is our top priority. Therefore, we fully comply with occupational health and safety standards and continuously strive to improve them. Occupational health and safety policies and procedures are established, and regular training is provided to employees. Additionally, continuous monitoring is conducted to assess and prevent potential risks in the workplace, and improvements are made accordingly.

3.5. Combating Bribery and Corruption

Our company is committed to combating bribery and corruption. Accepting or offering bribes, engaging in corruption, or allowing such activities is unacceptable. All of our employees must fully understand the legal regulations related to bribery and corruption, as well as company policies, and act with caution in this regard. In the event of any suspicion of bribery or corruption, it will be immediately reported to the relevant authorities, and necessary investigations will be conducted.

3.6. Compliance with Tax Legislation

As a company, we fully comply with tax legislation and ensure that tax declarations are made accurately and on time. Tax evasion or attempts to evade taxes are unacceptable, and legal actions will be taken against those involved in such activities.

3.7. Confidentiality and Protection of Internal Information

The confidentiality and protection of internal information is a critical priority for our company. Our employees are obligated to keep the company's trade secrets, customer information, financial data, and all other internal information confidential. Unauthorized use, disclosure, or misuse of this information can lead to serious consequences, and as such, severe penalties will be imposed in the event of any violation.

3.8. Donations, Sponsorships, and Social Investments

Our company is aware of its responsibilities toward society and actively participates in social responsibility projects and community investments. Our donation and sponsorship activities are managed transparently and aim to provide social benefit.

3.9. Compliance with Competition Law

Our company is aware of its responsibilities toward society and actively participates in social responsibility projects and community investments. Our donation and sponsorship activities are managed transparently and aim to generate social benefit.

3.10. Creating a Healthy and Safe Work Environment

Ensuring that employees work in a healthy and safe environment is one of our company's priorities. To this end, occupational health and safety policies are established, risk assessments are conducted, and regular training is provided to employees. Additionally, continuous monitoring is carried out to identify and prevent potential risks in the workplace, and improvements are made accordingly.

3.11. Use of Social Media Accounts

The use of social media accounts representing the company’s name is subject to specific rules. Our employees must use social media accounts in a way that protects the company’s reputation and must not share the company’s confidential or commercial information. Additionally, sharing negative or misleading content about the company’s employees or stakeholders on social media is also unacceptable.

3.12. Acting with Honesty and Fairness in Relationships with Stakeholders

Honesty and fairness are fundamental in all our relationships with stakeholders (customers, suppliers, business partners, shareholders, and the community). The reputation and long-term success of our company are built on strong and trustworthy relationships with our stakeholders. In the event of any biased behavior or conflict of interest, we have a policy of transparent reporting and corrective actions.

3.13. Salaries

Ensuring that employees receive fair and competitive salaries is one of our company’s priorities. Our compensation policies take into account employees' contributions, experience, and performance. Transparency and fairness are essential in the process of determining and increasing salaries.

3.14. Discrimination

Our company does not tolerate any form of discrimination and provides equal opportunities to all employees. Discrimination based on race, gender, age, religion, ethnicity, sexual orientation, or any other personal characteristic is strictly unacceptable.

3.15. Building Sustainable Relationships

Our company aims to build long-term, mutually beneficial relationships. We develop sustainable and trustworthy relationships with customers, suppliers, business partners, and other stakeholders. These relationships are built on mutual understanding, respect, collaboration, and consensus.

3.16. Freedom of Association and Collective Bargaining

The right of employees to organize and engage in collective bargaining is a fundamental human right that our company respects. Employees are free to exercise their right to unionize and participate in collective bargaining processes. Protecting and supporting these rights is an integral part of our company policy.

3.17. Ensuring Transparency and Compliance with Regulations in Donation and Sponsorship Activities

Our company prioritizes transparency and compliance with regulations in donation and sponsorship activities. The principle of transparency is adopted in the management and utilization of these activities, ensuring full compliance with relevant regulations. Donations and sponsorships are carefully selected and monitored to align with the company's values and strategic objectives.

3.18. Prevention of Harassment and Violence

Our company does not tolerate any form of harassment or violence. In the event that employees, customers, suppliers, or other stakeholders are subjected to harassment or violence, immediate measures are taken, and necessary legal processes are initiated.

3.19. Protection of Personal Data and Ensuring Confidentiality

Our company places great importance on the protection of personal data of employees, customers, and other stakeholders. The collection, use, storage, and sharing of personal data are fully compliant with confidentiality and security standards. These processes are managed and audited in accordance with relevant regulations.

3.20. Protection of Trade and Strategic Secrets

Our company takes the necessary measures to protect its trade and strategic secrets. Confidentiality policies and procedures are established and implemented to prevent the disclosure of these secrets. Employees are responsible for safeguarding this information.

3.21. Care in the Selection of Business Partners

Our company carefully selects its business partners with great attention to detail. The performance of potential partners is evaluated based on their business ethics, quality standards, and environmental and social responsibilities. Fair competition, transparency, and long-term business relationships are the key principles we follow.

3.22. Creating a Fair and Sustainable Work Environment

Our company aims to provide a fair and sustainable work environment. Policies and practices are developed in areas such as workers' rights, occupational health and safety, and work-life balance. The well-being and satisfaction of our employees are prioritized.

3.23. Responsibilities of Our Employees

Employees at our company are responsible for performing their duties in an ethical and responsible manner. They are accountable for complying with company policies, procedures, and regulations, collaborating with others, maintaining open communication, and embracing the company's values.

3.24. Responsibilities of Our Managers

Managers are responsible for upholding the company's ethical values and effectively managing business operations. Their duties include implementing company policies, motivating employees, providing leadership, managing risks, and ensuring the company's long-term success. Managers are also responsible for promoting employee development and safeguarding the company's reputation.