



# CEVHER JANT Code of Conduct

This document has been prepared in order to notify the obligation about legal regulations, ethics and professional principles and global rules, which Cevher Jant employees are obliged to observe.

It is the duty of mid- and top-level managers to show the necessary diligence and leadership for the notification of Cevher Jant's Code of Conduct to all employees and to ensure that employees pay due attention and comply with these rules.

## 1. CEVHER JANT Employee Relations

**Cevher Jant,**

- Values its employees and respects their rights.
- Seeks for suitability for job as single standard in hiring process and ensures the equality of opportunities without making discrimination.
- Aims to gain maximum advantage from its employees' skills, power and creativity.
- Provides chance and equality of opportunities for the education, orientation and development of its employees.
- Aims to increase the loyalty of their employees towards the company ensuring equality of opportunities in respect of advancement and rewarding.
- Keeps the sustainable peace in the workplace.
- Ensures clean, healthy and safe working conditions for its employees.
- Creates and maintains an environment that promotes transparency and mutual respect, which is the basis of cooperation and solidarity, and ensures its sustainability.
- Does not tolerate harassment at the workplace under any circumstances.
- Evaluates its employees' opinions and suggestions, responds to and performs motivation increasing studies.
- Does not share private data related to the employees with third parties without the consent of its employees, unless a legal obligation applies.
- Respects human rights, constitutional organization and collective agreement rights.
- Does not accept child labor and employment.
- Does not support, contribute to, facilitate human trafficking and does not tolerate disciplinary measures involving physical or psychological abuse of any kind.
- Prohibits forced or compulsory labor as slaves, does not contribute to it prohibits any kind of slave, forced or compulsory labor force and does not contribute to it.

## 2. CEVHER JANT External Relations

Basic principles guiding Cevher Jant external relations are as follows:

### 2.1. Legitimate and Compliant and Legal Transactions

- Regarding subject covered by its scope of business area acting in compliance with laws, international treaties of which the Republic of Turkey is a part, Cevher Jant's policies and working principles,

- Managing, recording and reporting entire business activities and accounting system complete and compliant manner in accordance with the laws,
- Taking essential agreements executed with third individuals and establishments in compliance with laws and codes of conduct in a clear and understandable manner,
- Preventing the performance of any transaction, which will obligate Cevher Jant, by any employee other than the ones authorized in accordance with the principles and limits mentioned in circular letters of authorized signatories or relevant special letters of authorization.

## **2.2. Social Responsibility**

- Supporting studies, which will contribute economic and social development,
- Showing awareness regarding subjects related to the community and support the positive development of the community,
- Supporting its employees to be voluntaries regarding social activities in which they shall take part with social responsibility awareness.

## **2.3. Customer Relations**

- Creating a value for the customers, responding their demands and requirements on top level,
- Providing quality products and adopting consistent policies,
- Creating a long-termed trust environment with its customers,
- Preventing that customers are provided with misleading and short information.

## **2.4. Supplier Relations**

- Creating mutual value in its business relations with suppliers,
- Managing a transparent, direct and accurate relation with the suppliers,
- Making decisions under objective criteria in selecting suppliers,
- Complying with reasonable confidentiality and work safety rules, if desired by the supplier.

## **2.5. Competition**

- Beyond limits permitted by the legislation, avoiding agreements and coherent actions, which purpose to prevent, infringe, restrict direct or indirect competition with rivals or further individuals or enterprises, or which cause or may cause such effect under any circumstances,
- Avoiding misusing its dominant position, where the company is in a dominant position in a certain market singly or along other establishments,
- Avoiding negotiations and information exchange in order to define the market and/or competition conditions together with the competitors. Avoiding any contacts and transactions during private or occupational meetings and conferences participated in representation of the company, which may cause or described as above mentioned circumstances.

## **2.6. Institutional Briefing**

- Making statements or annunciations related to public disclosures as per the laws, through legal representatives in compliance with the laws and legislations,

- Ensuring that newsworthy and publicity purposed statements are made only by company's representatives,
- Ensuring that any information requests, received beyond the ordinary business course, are only replied by company's representatives.

## **2.7. Quality**

- Ensuring continuous development culture in our processes and to be an institutional and international supplier in the wheel rim sector,
- Supporting the participation of Cevher Jant's employees to the quality culture and their qualification and creativity in this respect,
- As an expert of our business and the solution partner of our customers, providing our customers with high quality and safe products at the right time,
- Simplifying our business process and being focused on added value creation activities,
- Speaking out company and process targets with metrics in order to ensure continuous development

## **2.8. Environmental Responsibility**

- Complying with laws and legislations,
- Being a solution partner considering demands of private and public institutions and establishments to whom we stay in communication related to the environment,
- Ensuring that our employees adopt the principle to work with environmental conscious and responsibility and that they make it a part of their lives in accordance with this principle,
- Ensuring that environment conscious is also developed in all institutions and establishments with whom our company is in communication, and ensuring that they work parallel to our objectives and targets in our environment policies,
- Tracking our progression under the extent of our environment policy and continuous improvement.

## **2.9. Occupational Health and Safety Protection**

The adherence to the relevant safety rules is evident at CEVHER. All Employees are required to know and comply with applicable safety rules and ensure that others comply as well. Employees are expected to set an example by strictly applying the safety rules themselves and ensuring that others do the same, remaining cautious of accidents and/or risks and promptly acting to ensure that potential hazards are addressed immediately.

- Complying with the laws and legislations,
- Ensuring an appropriate working environment and perform controls in order to minimize and prevent occupational accident and disease risks,
- Providing all our employees with the required trainings during their entire working life in order to ensure that they adopt the OHS (Occupational Health Safety) culture as their lifestyle,
- Supporting protection and development of their own health to increase the healthy life conscious and to enable them to maintain a healthy, dynamic and peaceful life from physical and spiritual aspect.

## 2.10. Global Responsibility

- Acting to the favor of our country and world in compliance with the rules of Agreements of Global Principles of the United Nations, to be endeavored that our employees and suppliers act in compliance with these.

## 3. Codes of Conduct to be Complied with by CEVHER JANT Employees

**Expectations from Cevher Jant employees are as follows:**

- To comply with the laws,
- To fulfil their duties under the scope of basic moral and humanitarian values,
- To act fair, in good will and tactful in order to ensure mutual benefit in their business relations. For any purpose whatsoever, avoid deriving improper personal benefits from persons and establishments, receiving and making bribery or facilitation payments,
- During duties within and out of the company to act in compliance with the Codes of Conduct and all implementation principles supporting these, to avoid any behavior in their business and private life, which may harm Cevher Jant's reputation,
- Unless obviously authorized, to avoid any actions, statement or written conversation, which may obligate the company,
- To avoid any actions, which may disturb and/or harm other employees, and affect the working harmony,
- Including company's data and information systems, to take care of any tangible and intangible assets of the company as like as their private assets; to protect these against potential loss, damages, false use, misuse, burglary and sabotage,
- To avoid using the working hours and company's sources directly or indirectly for their personal interest, political activities, etc.,
- Whether an employee is deployed for a duty in an establishment other than Cevher Jant gaining an income in subjects included to his/her profession or expertness, or works in another work is subject to company's written approval

### 3.1. Asset and Information Management

#### 3.1.1. Intellectual Property Rights

Intellectual property is recognized as, but not limited to: patents, trademarks, copyrights, designs, models, samples and business intelligence such as expertise or information entrusted by Customers or Suppliers.

All CEVHER Employees and Suppliers must make sure to protect CEVHER's intellectual property against access by unauthorized Employees and third parties

- To start at the correct time and ensure accomplishment of legal procedures in order to secure the intellectual property rights of new developed products, processes and software,
- Cevher Jant's employee shall act in the awareness, that Cevher Jant is the owner of any intellectual and industrial property rights regarding works they developed during their employment with Cevher Jant, and shall act sensitive against violation of such rights,

- To avoid –on purpose- unauthorized utilization of patents, copyrights, commercial secrets, brands, computer programs or further intellectual and industrial property rights pertaining to other companies,
- To avoid utilization in any manner whatsoever work of arts, which are subject to copyrights, without the permission of the royalty owner, to show necessary attention and care in accordance with this responsibility.

### **3.1.2. Information (Data) Management & Disclosure of Information**

CEVHER GROUP employees who in the course of their duties communicate with the Company's Stakeholders regarding financial and non-financial information, are obliged to proceed openly and in accordance with applicable laws and regulations

- To ensure that all legal records are maintained properly,
- To ensure that any information and document requests, received from the official institutions during the ordinary business course, are responded by the relevant departments,
- To avoid responding without approval of the top management any information requests, received from third parties, which are included to the confidentiality category in respect of the company,
- To show necessary care and attention in order to ensure that statements made and reports submitted by the company are authentic. Any documents used by the employees related to the business are the property of Cevher Jant. Such documents shall be maintained or destroyed in accordance with Cevher Jant's procedures.

### **3.1.3. Export Controls and Sanctions**

Governments and international organizations may impose temporary restrictions such as embargoes or economic sanctions, affecting certain business transactions which apply to countries or individuals. CEVHER respects international regulations and does not make transactions, nor deal with goods or technologies, affected by restrictions

### **3.1.4. Counterfeit Parts**

CEVHER GROUP requires its Suppliers to develop, implement, and maintain effective methods and processes to detect and minimize the risk of introducing counterfeit parts and materials into our supply chain. If detected, the Suppliers are expected to establish effective processes to quarantine the product and notify the recipients of counterfeit product

### **3.1.5. Asset Management**

- To show care for protection and productive utilization of company's assets, taking any measurements in order to prevent that these are stolen or harmed,
- Company's employees are responsible for properties debitted to them and for damages caused by themselves during the utilization of these.

### **3.1.6. Security and Crises Management**

- To take necessary measurements in order to protect company's employees, information and data systems, factory and administrative facilities against potential terror actions, natural disasters and malevolent attempts,

- To make necessary crises planning regarding the urgent crises management to be constituted in case of terror, natural disaster, etc. incidents; by this way to ensure the business continuity with minimum loss in such a crises moment.

#### **3.1.7. Confidentiality**

CEVHER Employees, as well as the Company's Suppliers, are required to protect any confidential information (documents, digital data) whether they are generally acquainted or Employees have been provided access explicitly.

Employees and Suppliers are expected to consider and comply with the company's policy, guidelines and contracts on information security and confidentiality.

- To act in the awareness, that financial and commercial secrets, information which may weaken the competition power, personnel rights and information, agreements with business partners, which are the property of Cevher Jant, are subject to "confidentiality", and to ensure the protection and confidentiality of these,
- Avoid sharing with unauthorized persons and authorities within and out of the enterprise by any reason whatsoever information made out and possessed in course of their job, and utilization (direct or indirect) thereof with speculative purposes,
- To avoid using information, which are related to companies where they are employed and their customers and persons and companies with whom business are done and which are not in public domain, in any manner whatsoever other than for the intended purpose; to avoid sharing these with third parties without having obtained necessary permissions. To avoid disclosure of confidential information and documents pertaining to their previous employers to Cevher Jant or other employees, and to avoid requesting from other employees to disclose such type of information,
- In order to protect and keep the prototype product and design information of Cevher Jant not yet released to the market, to make every effort to ensure that all employees and third parties connected to them do the same, and not to use the privileged information in question for their own benefit or for the benefit of third parties.

#### **3.1.8. Financial Responsibility**

At CEVHER GROUP the essential business processes are documented in a proper manner and relevant financial information is recorded to faithfully reflect the business operations with complete reports.

Employees who, in the course of their duties record or submit accounting or financial data, calculate and transmit indicators, or manage and circulate any other type of information, must ensure that said data, indicators and information are accurate, reliable and sincere.

### **3.2. Avoiding Conflicts of Interest**

Conflict of interest; means any benefit gained to themselves, their relatives, friends or related persons or organizations, which affect or may affect those employees execute their duties in an impartial manner, or the situation possessing any material, or any personal benefit related to these.

#### **3.2.1 Avoiding to perform any transaction to the benefit of themselves or relatives**

- To avoid gaining unfair benefit in favor of themselves, their relatives or third parties using their title and authority,

- To show care not to fall in a conflict of interest situation with Cevher Jant,
- To show care, that personal investments to be done or any occupation other than the business activities, prevent to spend time and show attention to the execution of the currently continuing duty, and to avoid occurrence of such situations, which prevent focusing to the main duties,
- If the persons, who are holding a first degree decision maker position in a company, which is a customer or supplier occupied with the same business, are a first degree relative of the employee, to notify his supervisor about this situation,
- The employees are obliged to mention during their initial recruitment the situation of being holder of shares or participating to investments of other companies in a manner that could be considered as a conflict of interest. Candidates are particularly questioned regarding this subject during their business interviews. Employees shall notify any potential changes regarding this situations and subjects, which may be considered as similar conflicts of interest, within 10 days to their supervisors and such notification shall be transmitted up to supervisors of at least two higher orders.
- In case of detection that first degree relatives of the employee are possessing shares or any material benefits in another company, to whom the company has commercial relations, this circumstances shall be notified to employee's supervisor within 10 days after its detection.

### **3.2.2. Participation to representation and organization invitations**

- Participation to events and activities, which are effective in making decisions or which may be perceivable as such, organized by persons and establishments staying in business relation or having such potential, requires the approval of the company. Supporting activities (i.e. sponsorship, scholarship) executed by Cevher Jant are managed institutionally. Employees, who are not commissioned, are not allowed to perform any activity on behalf of Cevher Jant regarding such and similar subjects.

### **3.2.3. Accepting and Giving Presents**

When managing relations to private or official persons and establishments, who intend to establish or continue a business relation with Cevher Jant;

- Other than promotion purposed articles, any presents, which leave the impression of existence of an irregularity, which may cause a dependancy relation or may be perceived as such, shall not be accepted and offered,
- Any discount or interest from suppliers, customers, community companies or third parties, which may be perceived as unsuitable, shall not be requested, offered to third parties, and shall not be accepted if offered

### **3.2.4. Business done with Cevher Jant by ones having quit the job**

- Doing business with Cevher Jant as seller, contractor, consultant, commissioner, representative, vendor or in similar manners by founding personally a company or establishing a partnership of a company after having quit his/her duty with the company, may cause negative impressions and is a very important subject, which requires attention.

It is required to act prior and after such a period under the extent of company's interests; to observe moral and ethical rules; and prevent conflicts of interest prior and after such period.

In case of inappropriate situations, no commercial relation shall be established with such person. Other than exceptional circumstances, in order to prevent negative impressions, such kind of commercial relations to former employees shall be prevented.

#### **4. Environment**

- Within the borders of the Cevher Jant factory; it is targeted to ensure environment related application to the full extent. Employees shall act in accordance with the rules and instructions stipulated for this purpose, and shall take necessary precautions.
- Related to the environment; Cevher Jant adopts the principle that improvement activities fullfilling all legal and further obligations i.e. separation at the source, waste management, reducing natural source consumption, air, water, waste-water and chemical management, reducing environmental affects occuring during the wheel rim manufacture are the common responsibility of entire employees, and deploys this proactive environmental approach during all of its activities.
- Employees shall avoid within the company any actions, which may harm the environment.

#### **5. Occupational Health and Safety**

- Cevher Jant adopts the principle that activities of improving the occupational health/safety fullfilling all legal and further obligations related to occupational health and safety is the common responsibility of all employees, and deploys this proactive occupational safety approach during all of its activities.
- Cevher Jant targets to ensure at the workplace and on the job the occupational health and safety to the fullest extent. Employees shall act in accordance with the rules and instructions defined for this purpose, and shall take the necessary precautions.
- The employees shall avoid possession of any objects or materials at the workplace, which may present danger or illegality in respect of the workplace and/or labors.
- The employees, in case of non-prescription drugs, are not allowed to keep and use narcotic, addictive drugs that restrict and/or eliminate mental and physical faculties, and they shall not work under the influence of these kind of drugs.

#### **6. Political Activity Prohibition**

Cevher Jant does not donate to political parties, politicians or political candidates. Regarding this subject any demonstration, propaganda or activities with similar purpose within the borders of the workplace are not allowed. Company sources (vehicle, computer, e-mail, etc.) shall not be assigned to activities with political purposes.



## 7. Principles of Implementing Codes of Conduct

### 7.1. Obligation to Notify Violations

If Employees become aware or get suspicious about violation of laws, legislation or rules to which the company is subject, they are obliged to notify their supervisor (their first manager) or Depending on the situation, verbally by phone number +90 212 800 01 91 (etik line) or by using the corporate username (cevheretik) and password (Cevheretik2023) via the login address [www.remedetikhat.com.tr](http://www.remedetikhat.com.tr) or by e-mail to [gem@etikhat.com](mailto:gem@etikhat.com). They are obliged to submit it in writing with their address.

It will be definitely prevented that a notification made by an individual, in a manner which may affect the peace at the workplace or his/her business relations negatively, is disclosed to 3<sup>rd</sup> parties.

It shall be taken care that the notifying mechanism ensures to company's benefit.

It is very important that the notifying person is free of intentions like gossiping about the notified subject or trying to have negative effects on the career. In this respect constitutes confidentiality, objectivity and compliance with codes of conduct during the notification and investigation process is a quite critical subject. It is mandatory that both the notifying persona and the persons managing the process related to the subject pay maximum attention and care to this subject.

Detection of intentional notifications i.e. lies and/or purposing slander are interpreted as violation of codes of conduct.

### 7.2. Discipline Application

In case of violation of Codes of Conduct, it will be proceeded in accordance with Company's Disciplinary Regulation.

### 7.3. Implementation and Supervision

- Functioning of codes of conduct, which are defined above and have to be complied with during all activities, are managed by the Manager of Human Sources, who are continuing their duty pertinent to the Executive Committee within the structure of Cevher Jant. The Executive Committee assigns the Ethics Committee, which consists of the Human Resources Manager, the Technical Director, and the Quality Assurance and Continuous Improvement Manager, to carry out the relevant activities
- Implementations and sanctions related to company policies of Cevher Jant are defined in the circular and procedures related to Service Contracts, Personnel Regulation.

### 7.4. Whistleblowing and protection against retaliation

In case of doubt on the fulfillment of the above commitments and to avoid inadmissible activities, the Employee must contact a direct superior/manager or if in justified circumstances, the Compliance Delegate relevant to the company.

CEVHER assures that all employees who provided a grievance report, are protected against threats, harassment or other adverse actions by the Company. No whistleblower has to fear a termination of employment.

## 7.5. Freedom to Compete

Our company follows a market policy that encourages free and fair competition with other companies in our sector. We do not develop any strategies such as manipulating market dynamics or limiting the activities of our competitors. Full compliance with competition laws and regulations is among the priorities of our company. We conduct our activities in accordance with the legal frameworks determined to prevent restriction of competition. In our relations with our suppliers and customers, a fair and transparent process is followed and no coercive or restrictive actions are taken. These relations are carried out by respecting the parties' right to free bargaining.

## 7.6. Money Laundering

Our company absolutely rejects money laundering in order to prevent the financing of illegal activities and to provide a lawful business environment. Our company operates in full compliance with national and international laws and regulations aimed at combating money laundering. In this context, we fully fulfill all legal requirements aimed at preventing money laundering.

Our company bases all financial transactions on transparency and accountability. Any transaction or behavior that may facilitate money laundering activities is absolutely unacceptable.

## DOCUMENT REVISIONS

Rev. No.	Rev.date	Revised sections	Revisions made
5	3.11.2022	2.9; 3.1.1; 3.1.3; 3.1.4,	2.9; 3.1.1; 3.1.2 Prefaces added 3.1.3. Export Controls and Sanctions added 3.1.4. Counterfeit Parts added 3.1.8. Financial Responsibility added 7.4. Whistleblowing and protection against retaliation added
6	25.12.2023	7.1	Remed ethics line communication channels have been added to Article 7 of the Code of Ethical Conduct Implementation Principles.
7	28.08.2024	7.5-7.6	Freedom of competition and anti-money laundering articles were added within the scope of the Ecovadis Audit.