

ARTICLE 1 - PURPOSE

1.1. The Ethical Conduct Policy (hereinafter referred to as the “Policy”) has been prepared to encompass all operations and activities of Beta Enerji ve Teknoloji A.Ş. (hereinafter referred to as the “Company”), and to serve as a guide in defining and implementing the ethical rules and principles expected to be followed by all employees, business partners, and suppliers, as well as the governance structure related to these matters.

ARTICLE 2 - DEFINITIONS

2.1. This section briefly defines the specific terms and concepts used in the Policy:

Company: Refers to Beta Enerji ve Teknoloji A.Ş.

Policy: Refers to the Ethical Conduct Policy.

Employee: Refers to the Company’s managers and employees.

ARTICLE 3 - SCOPE

3.1. This Policy applies to;

- a) The Company’s General Manager,
- b) Company Employees,
- c) Companies from which goods and services are procured, along with their employees,
- d) Individuals and entities acting on behalf of the Company—including but not limited to consultants, lawyers, advisors, and external auditors—as well as other individuals, including customers with whom the Company maintains commercial relations (collectively referred to as “Business Partners”).

ARTICLE 4 - DUTIES AND RESPONSIBILITIES

4.1. Legal Responsibilities

4.1.1. The Company designs its investments and power plants in accordance with relevant legislation and regulations in order to operate sustainably and protect the environment, and goes beyond legal requirements where possible. In all its domestic and international operations, the Company acts in compliance with laws and international legal norms, cooperates with public institutions and authorities, and provides any requested information, documents, records, and notifications accurately, in a timely manner, and in an understandable format.

4.1.2. The Company demonstrates sensitivity in complying with all regulations relevant to its operations—particularly financial and environmental legislation—and expects the same from all third parties with whom it collaborates. In dealings and communications with public officials, the Company always acts honestly and does not attempt to influence their decisions through gifts, assistance, bribes, or any other unethical offers

4.2. Responsibilities Toward Customers

4.2.1. In all areas where the Company operates, its primary goal is to meet customer expectations at the highest level. Based on this objective, the Company constantly strives to foresee its customers' needs accurately and develop new products that enhance their quality of life and promote responsible consumption. The Company continuously renews and improves itself by taking customer satisfaction and feedback into account. Operating with a customer-focused mindset, it responds to all customer needs, requests, and expectations in the shortest possible time and aims to resolve any issues promptly.

The Company guarantees the confidentiality of all customer personal data and commits not to share this data with third parties without customer consent, except where legally required or by court order. The collection, use, processing, and storage of personal data are carried out in a manner that ensures privacy rights and complies with applicable legal regulations.

It is a core principle of the Company to provide its services on time and under the promised conditions. The Company communicates with both internal and end customers with respect and courtesy, and acts transparently and honestly. It ensures that commercial agreements

with customers are clear and not open to misinterpretation and adopts transparency in all pre-agreement processes.

4.3. Responsibilities Toward Employees

Employees are the cornerstone of the Company's structure. For this reason, the Company values its employees as its most important resource and strives to ensure they work under good conditions, in harmony, with job satisfaction, and a strong sense of ownership.

The Company evaluates candidates during the recruitment process based on objective criteria. Selection decisions are made based on the requirements of the position, as well as the candidate's talent and ability, and equal opportunities are provided to all applicants. From recruitment to career progression and compensation practices, the Company guarantees that no discrimination is made based on language, religion, ethnicity, or gender and does not tolerate otherwise.

The Company ensures that employees fully and properly exercise their legal and contractual rights. It respects freedom of association and the right to collective bargaining.

The Company supports the personal and professional development of its employees by providing necessary training. It values each employee as an individual, keeps their personal information confidential, and uses such data only within the limits required by law.

By considering both general industrial knowledge and job-specific risks, the Company ensures a safe and healthy working environment. It takes appropriate measures to prevent accidents and injuries and to reduce job-related health risks to the lowest possible level.

Employees are free to participate in legal organizations of their own choosing. The Company recognizes and respects employees' lawful rights to organize and bargain collectively. No employee shall be threatened or penalized for joining such organizations.

4.4. Responsibilities Toward Competitors

The Company is committed to conducting its business in full compliance with anti-monopoly and fair competition laws that govern the jurisdictions in which it operates.

The Company believes in the principles of a free market economy and acts in a manner that protects competitive practices in all its operations, including pricing, purchasing and selling conditions, discounts, and customer selection. It does not attempt to obtain confidential information about its competitors in unethical ways, does not rely on or use information acquired through illegal or improper means, and refrains from engaging in any behavior or statements that may damage the reputation or dignity of its competitors. It respects the intellectual property rights of competitors and expects the same conduct in return.

In all marketing activities, including advertising, product and service promotion, the Company acts honestly and realistically, in compliance with legal regulations and public morality—especially in accordance with advertising ethics. The Company avoids any actions that may harm its reputation, and does not use language or expressions that may disparage competitors or their products in any form of announcement, advertisement, or communication.

4.5. Responsibilities Toward Society and Humanity

Within the scope of its Sustainability Strategy, the Company aims to create sustainable value for its stakeholders and acts in alignment with the objectives of the Sustainable Development Goals (SDGs). Through its operations and sustainable development strategy, the Company contributes to the well-being of the society in which it operates. It respects human rights and the values of diverse communities, and exercises care to avoid acting against the commonly accepted lifestyles, worldviews, and traditions of societies both in Türkiye and in other countries where it operates.

The Company has signed the “Global Compact,” an innovative corporate responsibility initiative that promotes universal principles for building a culture of shared development in the competitive business world, and implements these fundamental universal principles within its organization.

The Company works to enhance the education, culture, economy, and social welfare of the communities in which it operates. It avoids all behaviors that violate human rights, such as the illegal employment or exploitation of child labor, verbal abuse or mistreatment of workers, forced labor, and other forms of misconduct. It expects all suppliers and business partners to act in accordance with these principles and discontinues relationships with those who fail to show the necessary sensitivity to these matters.

In its factories, the Company complies fully with all legal requirements and standards related to apprenticeship or vocational training programs and ensures that such programs are officially recognized by regulatory bodies.

The Company refrains from including elements in its advertisements that contradict fundamental societal values, such as sexual exploitation or violence, and avoids any symbols, expressions, or implications that may encourage harmful behavior within society. It does not produce advertisements that are offensive toward any political opinion, religion, language, or ethnic group.

4.6. Responsibilities Toward the Environment

The Company prioritizes social benefit and acts with environmental responsibility in all its activities. It ensures full compliance with applicable environmental legislation and standards and works continuously to minimize its environmental impact in line with its sustainability strategy. The Company is committed to the conservation of natural resources and operates with environmental awareness.

Recognizing that fulfilling environmental responsibilities is inherently connected to fulfilling its responsibilities toward employees, society, and humanity, the Company carries out all its services and operations with a strong sense of environmental consciousness. It ensures that its facilities operate in accordance with standards that prevent environmental pollution.

As part of its sustainable growth strategy, the Company develops and implements methods to minimize the long-term environmental impact of its operations. It keeps the consumption of natural resources to a minimum during all stages of its operations, including construction infrastructure, heating, cooling, electricity, and water systems. The Company invests in energy efficiency initiatives to reduce its carbon footprint.

4.7. Information Security and Social Media

The Company is committed to complying with all legal regulations, applicable legislation, and the standards specified in ISO 27001 concerning information security and personal data protection. Information refers to any physical or digital data, text, image, sound, or similar

content produced, used, transmitted, archived, or legally transferred within the scope of business processes. Strategic information, organizational data, commercial, technical, and financial records, customer and dealer data, policies, procedures, regulations, product and service information, employee personal data, and any other relevant data fall under this category.

The Company views information security as one of its highest priorities and operates in accordance with the **Information Security Policy**, Information Security Guidelines, and the Law on the Protection of Personal Data (KVKK).

All non-public company-related information used internally is considered confidential and may not be shared with third parties outside the company unless required by the responsibilities of the position. Internally, although transparency is the main principle, information is shared only to the extent necessary for the fulfillment of duties.

All information developed by employees, acquired by the company, or generated within the scope of business operations belongs to the Company and is considered a trade secret. All non-public data in written, printed, or electronic form—such as financial, technical, business development, customer, supplier, and personnel information—is treated as confidential and proprietary.

All employees are individually responsible for ensuring the proper operation of information security systems established to protect confidential information. Employees must take care to prevent the loss, compromise, or alteration of the accuracy or integrity of any information or document they access or use in the course of their duties.

Employees are aware that all information (financial, customer, personnel records, etc.) accessed due to their roles is confidential and must not be shared with third parties. They act in accordance with the principles of loyalty, confidentiality, and non-competition.

Social media is commonly used within the Company to facilitate communication and meet business needs. Social media and internet services are primarily intended for business use, with limited allowance for personal use. Employees are aware that all information accessed or sent via digital platforms may be monitored and controlled by the Company. Passwords used for internet and email access are the responsibility of each employee.

In addition to the general principles outlined above, the following examples of information security and social media conduct must be observed:

- Employees must protect the confidentiality of any trade secrets or confidential information and adhere to loyalty and non-disclosure obligations.
- Any security breaches, vulnerabilities, or suspicious activities must be reported to the appropriate units or personnel.
- Confidential or private information related to employees, customers, suppliers, or business partners must not be used for purposes other than business and must be kept secure.
- No unauthorized sharing of information or documents obtained through work is allowed inside or outside the Company.
- Confidential information must not be used after leaving the Company to benefit competitors or harm the Company.
- Intellectual property such as patents, trade secrets, copyrights, trademarks, and names must be protected.
- Insider trading or financial gain through unauthorized disclosure of confidential information is strictly prohibited.
- When it is necessary to share specific information with third parties for business purposes, approval from senior management must be obtained and appropriate confidentiality agreements must be in place.
- Company-assigned email accounts are strictly for business use and may be subject to monitoring.
- Company-provided technological communication tools must not be used for personal purposes.
- Physical and environmental security of devices such as PCs, laptops, and servers must be ensured.
- Any information or documents requested by regulatory bodies or independent auditors must be provided accurately, understandably, and promptly.
- In case of accidental or unauthorized access to confidential information, employees must report the incident to the information security unit immediately.
- Personal visitors should only be received occasionally and meetings must take place in designated areas (e.g., cafeteria or meeting room) with supervisor approval.
- No documents containing company data (in electronic or printed form) should be taken outside the company without managerial approval.

- Software installations must be performed solely by the IT Department, and employees must not install or use programs that allow file sharing or downloading (e.g., music, images, videos).
- Chain emails (e.g., “chain letters”) must not be sent.
- All information and documents must be used, stored, and shared with due diligence to maintain their accuracy and integrity. Employees must act in accordance with the published Information Security Policy, which outlines these requirements in detail.

4.8. Relationships with Suppliers and Customers

Company employees must not derive personal benefit from commercial transactions with suppliers or customers. They are prohibited from using company information or their positions for personal gain, engaging in business competition with the Company, or maintaining close relationships with individuals or organizations who may benefit from insider knowledge acquired through their role. Accordingly, employees are not permitted to become owners or shareholders of any supplier or competitor directly involved in business relations with the Company.

In cases where a supplier or company owned or partially owned by an employee’s relative is involved in a business relationship with the Company, equivalent business terms must be ensured, periodic internal audit reports must confirm the fairness of the relationship, and the business must be entirely outside the employee’s scope of responsibilities. Even if these conditions are met, such relationships require the express written consent of the General Manager.

Employees must not engage in financial relationships such as lending, borrowing, or guaranteeing debts with suppliers, customers, or competitors. Additionally, employees must avoid overly close personal relationships with suppliers that could compromise professional conduct and must not accept personal shopping discounts from suppliers that exceed normal commercial terms.

As a general principle, the Company does not accept gifts from business partners. However, receiving (or offering) gifts from/to business partners may be permitted if the gifts are consistent with commercial customs, the Donations and Aid Policy, are given in good faith, and do not compromise objectivity. Any uncertainty on this matter must be resolved in accordance with the boundaries and rules set forth in the Donations and Aid Policy.

The Company strives to raise awareness among its suppliers regarding environmental, social, and broader sustainability issues. When selecting suppliers, it considers minimum environmental and social criteria and avoids working with those who fail to meet certain human rights standards.

The Company is committed to complying with all global trade controls, international export and import laws, and related regulations.

In addition to the general principles outlined above, the following specific scenarios must also be observed:

- Employees must not use their roles or authorities for the personal or private benefit of themselves, their families, or third parties. Company trade secrets and confidential information must not be shared with relatives or external parties.
- The Company may make donations with Board of Directors approval for the purpose of supporting public-benefit activities such as education, healthcare, arts and culture, law, scientific research, environmental protection, sports, inclusion of people with disabilities, entrepreneurship, technology, and communication.
- Donations may also be made to individuals, NGOs, associations, foundations, universities, or public institutions working in the fields of education, culture, arts, environment, and sports in line with corporate social responsibility and sustainability principles, and in accordance with the Capital Markets Law and its regulations.
- If a former employee becomes a potential supplier, no commercial relationship may be established with that individual for a period of two years—unless special approval is granted by senior management. If a former employee becomes a partner of an existing supplier, the current business agreements must be reassessed and handled according to the recommendation of the Disciplinary and Ethics Honor Board.
- Employees must not request that any suppliers or partner companies hire their relatives or acquaintances.
- Employees may participate in events organized by customers or their affiliated organizations, provided these remain within acceptable boundaries and are disclosed to senior management.
- Meals or other business-related expenses during meetings may be covered by customers or suppliers if appropriate to the business context.

- All donations and aid provided by Company management must align with the Company's vision, mission, and policies, and be guided by its ethical values. Such donations and aid must not disrupt Company operations. Ethical values and annual budget allocations must always be considered. Donations may be in the form of cash or in-kind contributions.

4.9. Use of Corporate Resources

Movable and immovable assets owned by the Company, any financial benefits acquired through Company means, and human and informational resources are all considered corporate assets. The use of such resources must always prioritize the interests of the Company. The Company provides all necessary and appropriate resources to its employees to enable them to fulfill their professional responsibilities.

Employees are expected to use any vehicles, equipment, assets, or privileges provided to them for business purposes with due diligence, without causing damage, and strictly for corporate use. For example, the following behaviors are considered improper use of Company resources:

- Making extended personal calls using a Company-issued phone,
- Excessive or unnecessary expenses during business travel,
- Assigning Company employees to perform personal tasks for managers,
- Using a Company vehicle for the benefit of third parties without a direct connection to the Company,
- Engaging in behaviors that obstruct the use of shared areas or damage fixed assets.

Such actions are regarded as misuse of corporate resources and are not tolerated.

4.10. Responsibilities of Managers

All professionals in managerial roles within the Company must possess the necessary skills, experience, qualifications, education, and expertise to effectively fulfill their duties and responsibilities. In addition, all managers are expected to act transparently, responsibly,

efficiently, and with integrity, carrying out their work in line with the principle of excellence and in the best interest of the Company. Managers at all levels are responsible for continuously improving these competencies.

Managers adopt the Company's Ethical Conduct Principles and serve as role models to promote these principles among their team members. In this context, managers are expected to:

- Encourage their subordinates to share thoughts, questions, and concerns regarding ethical conduct,
- Treat all ethical inquiries seriously and, if necessary, refer them to the Disciplinary and Ethics Honor Board without delay,
- Design business processes that minimize ethical risks by fully considering ethical procedures in the execution of responsibilities,
- Stay informed of the Company's published policies and regulations and ensure their team is appropriately informed about any updates,
- Immediately inform senior management of legal matters concerning the Company and refrain from taking unilateral action,
- Be proactive in taking initiative relevant to their duties and use their authority and responsibilities consciously.

All managers within the Company are required to operate in compliance with legal regulations, legislation, and the Company's internal policies and procedures. As such, they are expected to adopt and implement the following:

- The Environmental Policy and practices for environmental protection,
- The Human Rights Policy, and all decisions that support diversity, inclusion, and non-discrimination,
- Workplace health and safety measures, and proactive prevention of occupational accidents and illnesses,
- The Human Resources Policy and related procedures and requirements concerning recruitment, performance evaluation, and training.

Managers are also responsible for raising awareness of these principles within their teams and setting an example through their conduct.

4.11. General Responsibilities of Employees

Every individual within the Company is valued and respected for their unique lifestyle and worldview. The following are the general attitudes and behaviors expected from all Company employees in their professional conduct, particularly within the office environment, under the Ethical Conduct Principles:

- Employees must not physically, psychologically, or socially harass or disturb their colleagues. They must not engage in systematic and planned behavior intended to alienate a targeted person from the workplace, reduce their performance, or cause resignation.
- Employees must not use or be under the influence of drugs, stimulants, or alcohol in the office and are strictly prohibited from coming to work under such influence.
- Employees may only borrow from or lend to institutions that are legally authorized. They must not enter into personal debt or guarantee relationships with each other in ways that could damage the corporate image.
- Employees must not engage in crimes such as theft, breach of trust, forgery, fraud, slander, bribery, or embezzlement, whether inside or outside the Company. They must act as law-abiding individuals, fulfilling their duties and responsibilities toward the state and society.
- When ending their employment relationship with the Company, employees must return all work-related documents and information in full.
- Employees must perform their defined duties and responsibilities with good faith and a commitment to minimize errors.
- Employees must be aware of and adhere to designated working hours. They are required to report absences or tardiness and must not alter their work schedules without notifying their manager or the Human Resources Department.
- Employees are expected to participate in all planned trainings and organized meetings.
- If an employee becomes aware of any violations of Company procedures, they are obligated to report them to their immediate manager and/or the relevant department.

- Full-time, part-time, and contract employees must not work for competing firms—even during paid or unpaid leave periods—or in any other job that would provide financial gain. If they wish to engage in external paid work or consultancy (outside competitors), they must notify their supervisor and consent to any evaluations regarding potential conflicts of interest, loyalty, and performance.
- Employees must avoid misinformation, exaggeration, or misleading communication that may obstruct accurate messaging, and strive to maintain clear and effective communication.
- Employees are prohibited from making defamatory or derogatory posts about the Company on any platform, including personal social media accounts.
- Employees managing relationships with suppliers or business partners must not accept special discounted prices that are not available to other employees.
- Employees may only collect and share publicly available information about competitors.

4.12. Evaluation of Non-Compliance

The Company expects its employees to act in accordance with high standards and to consider the Company's core values when faced with ethical dilemmas. Employees are encouraged to evaluate their behavior through the lens of these values.

Unethical behaviors and situations may present themselves in many different forms, such as:

- A manager giving unethical instructions or guidance to subordinates,
- An employee acting in violation of the ethical rules or Company values,
- An employee observing a colleague engaging in unethical behavior,
- Individuals from business partners (customers, suppliers, etc.) making unethical proposals or requests to employees,
- Employees making unethical proposals or requests to business partners.

If an employee becomes aware of or suspects any violation of the ethical rules or Company values, they must report the situation to their immediate supervisor and/or to members of the Disciplinary and Ethics Honor Board. Before doing so, they should consider the following questions:

- Does the behavior contradict the Company's principles and ethical values?

- Is the behavior in violation of professional standards and the rules outlined in the Ethical Conduct Policy?
- Does the behavior present a conflict with the interests of the Company?
- Would this behavior, if known publicly, result in reputational harm to the Company in the eyes of the public, customers, or stakeholders?
- Is the behavior clearly unlawful or contrary to corporate regulations?
- Would an objective third party outside the Company view the observed situation as unethical?

If the answer to one or more of the above questions is "yes," the employee should report the matter to the appropriate channels without delay.

ARTICLE 5 – DUTIES AND RESPONSIBILITIES

5.1. The Beta Energy Disciplinary and Ethics Honor Board consists of five members: one chairperson and one general secretary appointed by the General Manager, and one representative each from the positions of Assistant General Manager/Director and Manager. Upon approval by the General Manager, the formation of the Board is announced to all employees by the Human Resources Department. The duties and responsibilities of the Disciplinary and Ethics Honor Board are as follows:

- Promote and foster the establishment and development of an ethical culture,
- Investigate and examine behaviors and practices that violate ethical conduct principles,
- Keep the identity of those who report or file complaints confidential and ensure that all investigations are conducted discreetly,
- Act independently of the organizational hierarchy or the units to which they report when performing their duties,
- Directly request any information, documents, or evidence from relevant units concerning cases that come before the Board,
- Examine any acquired information and documentation solely within the scope of the relevant issue,
- Attach all relevant documents and evidence to the investigation report, which is signed by the chairperson and members,

- Handle all agenda items promptly and reach a resolution as quickly as possible. The results of Board discussions are reported to the Board of Directors, and necessary actions are taken,
- Ensure fair execution of all processes, including:
 - Maintaining confidentiality of disclosures,
 - Presumption of innocence until proven otherwise,
 - Investigation based on the presence of sufficient evidence to support claims.

The individual who made the report will be verbally informed within a reasonable period, and the following information will also be recorded on the FR İK 0000 Disciplinary and Ethics Board Process Notification Card:

- Acknowledgment of receipt of the complaint,
- Information on how the case will be addressed,
- Estimated timeline for a final response,
- Outcome of the investigation.

5.2. All employees may report questions or suspected violations regarding the code of conduct either verbally or through the communication channels listed below for the Disciplinary and Ethics Honor Board:

Email: etikhat@betaenerji.com

Address: Hacı Sabancı Organized Industrial Zone, Çanakkale Cd. No:11 / B, Sarıçam,
ADANA / Türkiye

5.3. In addition to evaluating notifications of violations, the Board serves as a body that employees may consult for guidance in resolving ethical dilemmas. The Board is also open to any employee suggestions for enhancing ethical awareness and taking preventive/protective measures against potential violations.

5.4. Employees who report violations to the Disciplinary and Ethics Honor Board are guaranteed full confidentiality and protection from any negative consequences—provided the report is made in good faith.

5.5. All complaints and reports submitted to the Board are handled in accordance with confidentiality principles. Every phase of the investigation is documented. The Board has the

authority to request relevant documents and information from any department as needed to investigate a violation. It may also consult experts or specialists, observing confidentiality rules when necessary. Depending on the nature and severity of the violation, the Board may either resolve the matter directly or refer it to the Company's Disciplinary Committee, excluding its own participation.

5.6. Unless proven otherwise, the Board operates under the assumption that every employee acts in accordance with ethical rules. Any employee subject to a complaint or report will be given the opportunity to present their side of the story. Furthermore, unless the allegations are substantiated during the investigation process, the employee will be presumed innocent.

5.7. When a report or request for consultation is received, the Board may convene at the request of any member. The Board may invite individuals deemed relevant to the matter to attend meetings to provide additional information. The Chairperson of the Disciplinary and Ethics Honor Board is responsible for ensuring the implementation of the Board's working principles.

ARTICLE 6 – ENFORCEMENT

6.1. This Policy has been enacted by the decision of the General Manager dated **April 4, 2025**. It shall remain in effect until further notice or amendment.

ARTICLE 7 – REVIEW

7.1. This Policy is reviewed annually by the Disciplinary and Ethics Honor Board, taking into account any changes in processes or technical infrastructure. Any revisions made are subject to the approval of the General Manager before being enacted.

ARTICLE 8 – RELATED POLICIES AND PROCEDURES

Donations and Aid Policy

Environmental Policy

Human Rights Policy

Human Resources Policy

Anti-Bribery and Anti-Corruption Policy

Sustainability Policy

Competition Policy



ETHICAL CONDUCT POLICY

Doc. Code: 25-BTA-05
Publication Date: 04.04.2025
Rev.No: 0
Rev. Date: 04.04.2025

Information Security Policy

Sustainable Supply Chain Policy

Business Ethics and Code of Conduct Procedure

Reason for Revision :	New Document
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Prepared By	Approved By
Management Systems and Sustainability Engineer	General Manager