



**FORM SÜNGER VE YATAK SAN. TİC. A.Ş.**  
**CODE OF CONDUCT POLICY**

**Parent Process:** Code of Conduct

**Child Process:** Governance of Code of Conduct

**Policy:** Code of Conduct Policy

**Policy No:**

**First Released:**

**Approved by:**

**Revision No:**

**Latest Revised:**

**Approved by:**

**SECTION 1. OBJECTIVE**

**1.1.** Code of Conduct Policy (hereinafter "Policy") applies to all facilities and activities of Form Sünger ve Yatak Sanayi Ticaret A.Ş. (hereinafter "Company") and is developed with the aim of outlining the ethical rules and principles that all employees, business partners and suppliers are expected to comply with and the governance structure in this regard and to provide guidance on implementation.

**SECTION 2. DEFINITIONS**

**2.1.** Terms used in this policy that have a specific meaning are briefly defined below:

**Company:** Form Sünger ve Yatak Sanayi Ticaret A.Ş.

**Policy:** Code of Conduct Policy

**Employees:** Company managers and workers.



### SECTION 3. SCOPE AND RESPONSIBILITIES

3.1. This policy applies to

- a) General Manager,
- b) Employees
- c) Service or good vendors, and their employees,
- d) Other persons including all individuals and organizations working for Company including consultants, lawyers, advisors and external auditors, as well as customers with a business relation with Company ("**Business Partners**").

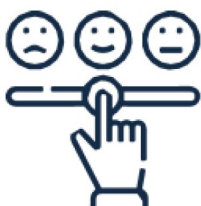
### SECTION 4. PRINCIPLES



#### 4.1. Legal Responsibilities

4.1.1. Company designs its investments and power plants in accordance with the relevant legislation and regulations, and goes beyond legal requirements where possible, in order to carry out its activities in a sustainable manner and protect the environment. It acts within the framework of laws and international legal rules while carrying out all its domestic and international activities, works in cooperation with all public institutions and organizations, and provides all kinds of information, documents, and notifications requested from it in a timely and understandable manner.

4.1.2. It exercises care in complying with the rules and requirements of all legislation related to Company's activities, especially financial legislation and environmental legislation, and expects the same from third parties and organizations with which it cooperates. Company always acts honestly in his/her dealings and communications with public officials and not seek to influence their decisions through gifts, assistance, bribes or other unethical offers.





## **4.2. Responsibilities to Customers**

**4.2.1.** Company's primary goal is to meet customer expectations at the highest level in all areas in which it operates. From this point of view, it constantly works to develop new products that will improve their quality of life and encourage responsible consumption by anticipating the needs of its customers in the most accurate way. It constantly renews and improves itself by taking into account customer satisfaction and all kinds of feedback from customers. With its customer-focused business mindset, it works with an understanding that responds to all needs, demands and expectations of customers in the shortest time and focuses on eliminating the problems that will arise in the shortest time possible.

Company guarantees the confidentiality of the personal data of all its customers and undertakes not to disclose this data to third parties without the consent of its customers, except for legal obligations or court orders. The collection, use, processing and storage of customers' personal data is carried out in a manner that guarantees their right to privacy and complies with the relevant legal regulations.

Company's basic principle is to provide its services on time and under the conditions promised. Company treats both internal and end customers with respect and courtesy, and demonstrates a transparent and honest approach. It exercises care to ensure that the commercial agreements it makes with its customers are arranged in such a way that there is no room for misunderstanding and acts with the principle of transparency in the pre-agreement processes.



## **4.3. Responsibilities towards Employees**

The basic building blocks of Company are its employees. For this reason, it values its employees as its most important resource and acts with an understanding that will enable them to work in good conditions, in harmony, satisfied with their job and adopting their work.

Company evaluates candidates according to objective criteria in recruitment processes; makes its selections based on meeting the requirements of the position, talent and ability, and offers equal opportunities to all candidates; guarantees that no employee is discriminated against on the basis of personal characteristics such as language, religion, ethnic origin and gender in all processes from recruitment to career and remuneration practices, and does not allow otherwise.

Company takes all necessary measures to create a safe working environment in its facilities and fields of activity; complies with the requirements of the applicable legislation and takes all measures deemed necessary in addition to the legislation; organizes mandatory and voluntary trainings for its employees on occupational health and safety issues and ensures continuous access to training materials; ensures that its employees fully and completely exercise their legal and contractual rights; respects freedom of representation and collective bargaining rights.



Company supports personal and professional development of its employees and provides them with the trainings they need; values its employees as individuals; keeps their personal information confidential and uses this information only within the framework required by law.



#### **4.4. Responsibilities towards Competitors**

Company believes in the necessity of a free market in business life and acts to protect the competitive structure in all its activities such as price determination, trading conditions, discounts and customer selection. It competes in compliance with the law within ethical rules and avoids unfair competition. It does not seek to acquire confidential information of its competitors, and does not rely on and use information that are made available to it by illegal ways. It does not make any derogatory statements and actions about its competitors and does not damage their reputation. Respects their copyrights. It expects its competitors to behave in the same way.

In all kinds of marketing activities such as products, services and promotions, especially advertising ethics, Company acts honestly and realistically in accordance with legal regulations and general ethics, and avoids any action that may damage the reputation of Company name, and avoids including statements or phrases that disparage its competitors or its competitors' products in its announcements and advertisements.



#### **4.5. Responsibilities towards Local Community and Humanity**

In line with its Sustainability Strategy, Company aims to create sustainable value for its stakeholders and acts to contribute to the goals of the Sustainable Development Goals; contributes to its community through its activities and sustainable development strategy; works by respecting human rights and the values of different societies and takes care not to contradict the generally accepted lifestyles, worldviews and traditions of the society in its activities both in Türkiye and in other countries.



In the communities where it operates, works to improve the education, culture, economy and social well-being of communities, avoids all kinds of conducts and behaviors contrary to human rights such as illegal employment and abuse of child labor, abusive words and treatment against workers, involuntary labor and similar conducts and behaviors, expects all suppliers and business partners to act in accordance with these issues, and terminates its commercial relations with persons and institutions that do not share same sensitivity in these regards.

Company does not include elements contrary to the fundamental values of society such as sexual abuse and violence in its advertisements and avoids any symbol, expression or implication that may lead the society to harmful habits; and does not advertise in a derogatory manner against any political view, religion, language or ethnic group.



#### **4.6. Responsibilities towards Environment**

Company conducts its activities with the principles of respect for and protection of the environment, ensures 100% compliance with relevant environmental legislation and standards, and works to minimize its environmental impact in line with its sustainability strategy.

Knowing that fulfilling responsibilities towards the environment also means fulfilling responsibilities towards employees, society and humanity, Company acts with environmental awareness during all its services and activities and operates its facilities at standards that will not cause environmental pollution.

Company develops and implements ways and methods to minimize the long-term negative environmental impacts of its activities within the scope of its sustainable growth strategy; minimizes the consumption of natural resources in all manufacturing processes, including the construction infrastructure, heating, cooling, electricity and water installations of all its facilities, and invests in energy efficiency to reduce its carbon footprint.



#### **4.7. Information Security and Social Media**

Company undertakes to comply with all regulations, legislation and standards specified in ISO 27001 regarding information security and personal data, which is defined as all data, text, image, sound and similar content in physical or digital media that are produced, used, transmitted, archived or legally transferred to Company in business processes. This include, without limitation, strategic information, organizational information, commercial, technical, financial data, customer dealer information, policies, procedures, regulations, product, service information, employee personal information and all other information.



Any business related and non-public information within Company are considered confidential information which shall not be disclosed to third parties outside Company, unless it is required for business purposes. While transparency is the main principle within Company, care is taken to disclose information to the extent required for business purposes.

All information developed by company employees, acquired by Company or revealed within the requirements of the business are a property of Company and is considered a trade secret. Information regarding company's products and services, finance, technical data, business development, customers, suppliers, employees and any other data that are not made publicly available, found in written and printed form, electronic media or computer programs is a property of organization and is considered confidential information.

All employees, as part of their roles, are responsible for the healthy operation of information security systems established to protect confidential information within Company. Company employees exercise utmost care to ensure that any information and/or documents they use and access while performing their duties are not lost and that the accuracy or integrity of such information and/or documents is not impaired.

Company employees are aware that all information (financial information, customer information, employee information, etc.) and/or documents they access due to their duties are confidential and they do not disclose them to third parties (persons outside Company). Employees act in accordance with the principles of loyalty, confidentiality and non-competition.

Social media is widely used in Company for making best use of the communication opportunities and business requirements. Social media or internet services are primarily for business use and to a limited extent for personal use. Employees are aware that any information accessed and sent electronically is under the monitoring and control of Company. Employees are responsible for protecting passwords used for internet access and e-mail services.

In addition to the above-mentioned general principles on information security and the use of social media tools, some examples are given below:

To maintain information security; Employees

- Should exercise utmost care to the confidentiality of confidential and/or trade secret information and adhere to the principles of loyalty and confidentiality.
- Report information security breaches, security gaps and any suspicious situation within the organization to the relevant units and persons.
- Protect the confidential and private information of employees, customers, suppliers, business partners and other persons and organizations with whom they work, and do not use this information except for business purposes.
- Do not share the information and documents acquired as part of their duties with unauthorized internal or external persons and do not use them for personal purposes in any way.
- Do not use the information and documents they have against Company or in favor of competitors, even after they left the company.
- Exercise utmost care to the protection of intellectual property such as patents, trade secrets, copyrights, names and trademarks.



- Do not forget that it is prohibited to leak any confidential information and/or documents within the scope of "Insider Trading" and to gain profit through the stock exchange or any other means.
- When some information needs to be shared with third parties due to the work, they inform the information security/relevant unit, obtain approval from the senior manager, and ensure that this information is shared in a way that will not harm Company (Non-Disclosure Agreement, etc.).
- Remember that Company-issued email account is issued for company business and can be monitored.
- Do not use for their personal purposes the technological communication tools provided to employees to exchange information within the business relationship.
- Avoid any behavior that may threaten the physical/environmental security of PC, Laptop, Server and similar information processing and production devices.
- Ensure that information and documents requested by Regulatory Authorities and Independent Auditors are shared accurately, clearly and timely in accordance with company practices.
- Apply to the information security unit in case of unauthorized/unintentional access, exposure or sharing of confidential information for any reason.
- Allow personal visitors to visit them in reasonable frequency and, in such mandatory events, meet with their visitors in canteen, cafeteria or interview room after the approval of the unit managers.
- Do not take any electronic and/or written documents (CDs, portable memory sticks, etc.) containing information and data outside Company for non-business purposes. (Approval of the manager is obtained when necessary).
- Know that the Information Technologies Department is authorized to install software on the entire system and they do not install or use programs that will enable sharing or downloading files such as music, pictures, movies, etc. on the internet.
- Do not send so-called "chain letter" e-mails.
- Pay due care and attention to the use, sharing, storage, protection of the accuracy and integrity of all kinds of information and documents. Must obtain, read, and act in accordance with "Information Security Policy" document as this document provides necessary instructions and information in detail.



#### **4.8. Relations with Suppliers and Customers**

Company employees do not benefit personally from commercial dealings with suppliers and customers, do not use corporate information and positions for their own benefit, do not commercially compete with Company, and do not have close relations with persons or organizations that will benefit from the information they have due to their job.



In this sense, employees shall not be owners or shareholders of a supplier or a competitor with whom Company has a direct business relationship.

In business relations with organizations owned or partnered by relatives of employees, it is expected that business conditions parallel to similar suppliers/customers are provided, that these conditions are demonstrated by periodic internal audit reports, and that the business relationship in question is completely outside the employee's scope of role. However, even if all these conditions are met, the relevant company is required to prove the explicit consent of the General Manager.

Employees should not have a financial interest relationship with suppliers/customers and competitors, such as lending and borrowing, guarantor ship and similar financial interests, and their social relations with suppliers/customers should not be at such extent that may harm the professional business relationship, and their personal purchases from suppliers should not be of a nature that may carry advantages beyond the usual commercial conditions.

Company works to raise awareness of environmental, social and broader sustainability issues among its suppliers. When selecting suppliers to work with, Company observes minimum environmental and social criteria, and reviews the business relationship with suppliers that are found not to fulfill certain human rights criteria.

In addition to the general principles mentioned above for relations with suppliers and customers, some specific cases are provided below.

- Employees may not use their duties and powers in the organization in any way for personal or private gain for the benefit of themselves, their families or third parties.
- Employees working in the purchasing functions of Company may not establish individual commercial relations with suppliers with whom they are in contact due to their business relationship.
- In the event that an employee who leaves company becomes a potential supplier, no commercial relationship can be established between him/her and the organization for two years, except for special permissions obtained from senior management. If the person has left his/her job by becoming a partner of a supplier with which he/she had a business relationship before, the existing commercial contracts are re-evaluated and the Ethics Board's opinion is taken into consideration.
- Employees do not make requests to any supplier company with which they have a business relationship due to their duties in Company for the employment of their relatives or acquaintances.
- Employees may participate in activities organized by customers or organizations where they are customers, provided that they remain within acceptable limits (with the knowledge of Company's senior management).
- It may be permissible for customers or suppliers to pay for catering services during meetings where business matters are discussed and reviewed, or other expenses appropriate to the requirements of the business.





#### **4.9. Use of Organizational Resources**

Company's resources include movable and immovable properties belonging to Company, all kinds of material benefits, human and information resources acquired using Company's means constitute Interests of the organization are taken into account in the use of resources on behalf of Company. Company provides its employees with all necessary and appropriate resources to fulfill their professional responsibilities.

Company employees agree to use the resources provided to them to fulfill their professional responsibilities responsibly and only for the organization. In particular, it is essential that human resources are employed in line with the interests of the organization, and it is a violation of this principle for managers to assign employees for their personal affairs.

Employees are expected to use all kinds of vehicles, fixtures, goods and facilities allocated for work without damaging them, in line with obligation of outmost care and only for the organization. This may include, for example;

- Long personal calls on a dedicated telephone,
- Excessive and unnecessary expenses made during business trips.
- Allocation of company staff time to the personal affairs of the manager,
- Use of Company vehicle for the benefit of third parties that cannot be directly associated with the organization,
- Any behavior that prevents the use of common areas or damages fixed assets,



#### **4.10. Responsibilities of Managers**

All professionals working in managerial roles within Company must have all the necessary skills, experience, qualifications, training and expertise to perform their duties and responsibilities. In addition, all managers should act transparently, responsibly, efficiently and honestly, and perform their work with the principle of excellence in the interests of the organization.



All managers of Company are obliged to continuously improve all aspects and capabilities listed above.

Managers at all levels of Company adopt Code of Conduct and set a pioneering and exemplary model for unit employees to adopt them. In this context, managers:

- Encourage their subordinates to share, question and comment on Code of Conduct.
- Take every ethical issue seriously and, if necessary, forward it to the Ethics Board in the shortest time.
- While performing their roles, take into account the entire ethics procedure and create business processes in a way to minimize the risks related to ethics.
- Know the instructions and regulations published within the organization and follow any changes and inform their subordinates as necessary.
- Immediately inform the senior management on matters of legal concern to the organization, and do not resort to individual solutions.
- Are willing to take initiative in their roles and do not consciously avoid exercising their powers and responsibilities.

All managers of Company acts in compliance with regulations, legislation and Company's policies and procedures, and in this context;

- Adopt, apply, and pioneer in raising awareness on, Environmental Policy and behaviors for the protection of the environment,
- Diversity and inclusion in all its decisions, anti-discrimination, and Human Rights Policy in this context,
- Behaviors towards occupational health and safety, taking necessary measures to prevent occupational accidents and diseases,
- Human Resources Policy and related procedures and requirements in the recruitment, evaluation and training processes of all employees,



#### **4.11 General Responsibilities of Employees**

Each individual is an asset within Company and his/her engagement in business life with his/her unique lifestyle and worldview is worthy of respect. Code of Conduct defines and outlines the ethical principles by main topics that Company expects and obliges all employees to comply.



This section outlines conducts and behaviors that each Company employee should adopt in working life and especially in the office environment.

Employees:

- Do not physically, psychologically and socially harass and disturb their colleagues, and do not engage in violent attitudes and behaviors.
- Do not use, and/or come to workplace under influence of, drugs and/or stimulants and/or alcohol in the offices.
- Borrow only from legally authorized institutions and organizations, and do not enter into debt and surety relationships among each other in a way that undermines the image of the organization.
- Do not commit theft, abuse of security, forgery, fraud, slander, bribery, embezzlement crimes (disgraceful crimes) inside and outside Company, and fulfill their duties and responsibilities to the state as individuals who respect social law and the law.
- Return all information and documents given to them within their roles when their employment relation with Company is terminated.
- Work in good faith and with effort of minimal error, to fulfill duties and responsibilities specified in their job descriptions.
- Know and follow the working hours set and announced for them. provide the reason when they do not show up for work during working hours or when they arrive late, and do not change their working hours without the consent of their own managers or Human Resources Department.
- Attend the trainings planned for them and all organized meetings.
- When they learn violations of practices within Company, report it to their senior manager and/or the relevant unit.
- Full-time, contracted and part-time employees may not work in a similar line of business in competitor companies, including paid/unpaid leave periods. Inform their superior managers if they work for side jobs or in positions such as consultancy in exchange for money, except for competitor companies, as such jobs are improper due to the remuneration and employment conditions. Consents to the evaluations in terms of competition, loyalty and performance for his/her work.
- Know that false, misleading and exaggerated information in communication will prevent the transmission of the correct message and therefore pay attention to establish healthy communication.



#### 4.12. Assessment of Non-Compliance



Company expects its employees to take into account Company's values and to base their behavior on these values when faced with a dilemma about how to behave in order to comply with high standards.

Unethical cases and behaviors can be encountered in many different dimensions, as can be seen from the cases below; they must inform their senior managers and if necessary Ethics Board members if they become aware of or suspect that

- Managers has given unethical instructions and directions to their subordinates,
- Employee himself/herself may be engaging in behaviors contrary to ethical rules and corporate values,
- Employee witnesses his/her colleague engaged in a behavior contrary to ethical rules or corporate values,
- In ongoing relationships with business partners (customers, suppliers, etc.), the owners, managers or employees of these companies have made unethical offers or demands to their employees.
- Employees have made unethical offers or requests to business partners (customers, suppliers, etc.)

by observing following criteria: In the event that the employee identifies behaviors that may be considered unethical or potentially incompatible with Company principles and professional business ethics, the employee should ask himself/herself the following questions and act according to his/her answers:

Is the behavior contrary to Company principles and business ethics?

- Is the behavior contrary to professional standards and the rules set out in Code of Conduct?
- Does the behavior conflict with the interests of the organization?
- Could the behavior have negative consequences for Company if the public, customers and other stakeholders heard about it?
- Is the behavior clearly against the law and organizational regulations?
- If a third party outside Company objectively evaluated the situation witnessed, would they perceive this situation as unethical?

Employee should analyze the situation and if they answer "yes" to one or more of the above questions, they should report this situation to the relevant managers.

## **SECTION 5. ROLES AND RESPONSIBILITIES**



**5.1.** Form Sünger Ethics Board is composed of a chairman and four members who hold different positions in different departments within Company. After the approval of the General Manager, it is announced to all employees by Human Resources Department and starts their duties.

Duties and Responsibilities of Ethics Board:

- Investigate complaints and reports on violations of Code of Conduct within Company,
- Resolve or have resolved the investigated violations of Code of Conduct,
- Provide opinions and suggestions for the implementation of Code of Conduct,
- Respond to applications made for consultation within the scope of Company Code of Conduct,
- Ensure that Code of Conduct is in compliance with the legislation,
- Inform employees about Code of Conduct and be in constant communication with employees to ensure the comprehensibility of policies and rules,
- Ensure that all new hires and employees read and are informed about Code of Conduct.

**5.2.** All employees can verbally report their questions about Code of Conduct and suspected violations, as well as use Ethics Board's communication channels listed below.

**E-mail:** [etik@formsunger.com.tr](mailto:etik@formsunger.com.tr)

**Address:** 1. Organize Sanayi Bölgesi 8. Cad. No: 60 38070 KAYSERİ

**5.3.** In addition to its function of evaluating reports of violations, this board is a body that all employees can consult with in cases of suspicion and ethical dilemmas. It is also open to all kinds of suggestions from employees in order to improve ethical awareness in Company and to take protective/preventive measures to prevent ethical violations.

**5.4.** For reports made to Ethics Board, Company Ethics Board assures that such reporting will not have any adverse impact on the employee, provided that such reporting is made based on good faith, and any kind of reporting will strictly kept confidential.

**5.5.** Complaints and reports received by Ethics Board are investigated under the confidentiality principles and each stage of the investigation is recorded. Ethics Board is authorized to obtain relevant information, documents and papers from any unit it deems necessary in relation to the matter it is investigating. Board shall take the necessary action to conclude investigations into violations in a swift manner and, if deemed necessary for the fair conduct of the investigation, may receive support from experts and specialists, taking into account the principles of confidentiality. Reported or detected rule violations may be resolved by Chairman of Ethics Board, taking into account their nature and effects, or they may be referred to Company's disciplinary board and resolved without the participation of Ethics Board.

**5.6.** Ethics Board operates on the presumption that each employee acts in accordance with the code of conduct, unless otherwise is concretely demonstrated.



An employee against whom a complaint or report is made for unethical behavior is given the opportunity to express himself/herself within the scope of the complaint/report. Furthermore, during the investigation process, the employee is presumed not to have committed any violation until the allegations against him/her have been substantiated.

**5.7.** Ethics Board convenes upon the invitation of any of Board Members when a report is received or an opinion is sought. Board may invite persons it deems appropriate to the meetings to collect information on matters deemed necessary. Chairman of Ethics Board is responsible for the implementation of Ethics Board's working principles.

## **SECTION 6. EFFECTIVENESS**

**6.1.** This Policy is made effective with a Resolution of General Manager. This Policy will remain in full force and effect until a revised version is put into effect.

## **SECTION 7. REVIEW**

**7.1.** This Policy is subject to regular review by Ethics Board annually on the basis of changes to the processes or technical infrastructure. Reviewed and updated policy will be signed off by General Manager.

## **SECTION 8. RELATED POLICIES AND PROCEDURES**

Environmental Policy

Human Rights Policy

Human Resources Policy

Anti-Bribery and Anti-Corruption Policy

Sustainability Policy