

Bilgi Birikim Sistemleri (BBS), operating in the information technologies sector, defines its human resources strategies and priorities by taking into account both the company's business goals and the specific requirements of its operational field.

I. OUR CODE OF BUSINESS ETHICS

A. Integrity

Integrity and honesty are our core values in all our business processes and relations. We act with transparency and honesty in our relationships with employees and all stakeholders.

B. Confidentiality

Confidential and private information includes data that may disadvantage BBS in terms of competition, trade secrets, personnel records, and information covered under confidentiality agreements with third parties.

As BBS, we are committed to protecting the privacy and confidentiality of our customers, employees, and all related individuals and institutions. We protect and use confidential company information solely for the purposes of BBS and share such information only with authorized persons.

We strictly prohibit the misuse of any internal confidential information for commercial gain. Employees must not remove confidential documents or proprietary materials when leaving the company.

C. Conflict of Interest

At BBS, we strive to avoid conflicts of interest. We do not derive personal benefit from business partners either directly or indirectly through family or close relationships.

We avoid any secondary job or business activity that would result in financial gain unrelated to BBS. We do not use the BBS name for personal benefit.

External business engagements or board memberships require written approval from BBS management, and must not interfere with the employee's responsibilities at BBS.

D. Our Responsibilities

We take care to fulfill our legal responsibilities and the responsibilities listed below to our customers, employees, suppliers, competitors, society and humanity.

1. Our Legal Responsibilities

BBS operates all of its activities and transactions in compliance with the laws of the Republic of Turkey and international law. We provide accurate, complete, and timely information to regulatory authorities. We maintain impartiality and avoid providing benefits to any public institutions, political parties, or NGOs.

We strictly prohibit the employment of child labor and ensure compliance through internal audits. This rule also applies to subcontractors.

2. Our Responsibilities Toward Our Customers

BBS works with a customer satisfaction-oriented approach. We respond to customer needs and requests quickly and accurately, deliver services as promised, and treat customers with respect, fairness, equality, and courtesy.

We share our labor, performance, ethics, environmental, health, and safety practices and expectations with customers via our website.

3. Our Responsibilities Toward Our Employees

BBS ensures that employees' personal rights are fully and correctly exercised. It treats employees with honesty and fairness and is committed to providing a non-discriminatory, safe, and healthy working environment.

BBS strictly prohibits involvement in human trafficking and does not employ forced, involuntary, or slave labor. It also refrains from procuring goods or services from companies that use such labor. Employees are never placed in debt to the company, and no form of financial deposit is ever demanded by them.

BBS strictly complies with all applicable laws regarding the employment of apprentices, interns, and students. The minimum age requirements stipulated by current laws and regulations are fully respected. This rule is also binding for subcontractors.

BBS is committed to maintaining a workplace entirely free from all forms of discrimination and verbal or physical harassment. Employees are encouraged to report their complaints and concerns without fear of retaliation, and these are resolved in an appropriate and timely manner. Complaints, suggestions, or ethical concerns may be submitted directly to management via written letters in the suggestion box, or through employee representatives. All matters are reviewed and addressed by the management.

BBS fulfills all legal obligations to ensure employee health and safety, takes all necessary precautions to prevent any health or safety risks, and supports employee development through training opportunities. Accordingly, an employee representative also serves on the BBS Occupational Health and Safety Committee.

BBS does not impose pressure on employees under any circumstances. All employees are employed in appropriate positions under equal conditions and of their own free will. The company will make every effort to support employees' individual development and encourage them to voluntarily participate in suitable social and community activities with a sense of social responsibility. A healthy work-life balance is prioritized.

All facilities will be provided to ensure that employees work in a suitable environment and can meet their basic needs under hygienic conditions. At BBS, employees' fundamental rights and freedoms (such as access to food, drink, breaks, restrooms, etc.) are never restricted. Legal rights are clearly communicated to all employees.

BBS organizes working hours in accordance with legal regulations, avoids enforcing regular overtime, and grants employees two days off per week. Recruitment, employment, placement, training, compensation, and promotion decisions are based on merit, performance, skills, and experience. Employees are compensated in line with industrial and general labor market standards. BBS acts in full compliance with laws governing wages, working hours, and overtime payments.

Employees are guaranteed the right to take their statutory annual leave, which is monitored and enforced. Under no circumstances is unused leave converted into monetary compensation.

4. Our Responsibilities Toward Our Suppliers

We act fairly and respectfully, as expected from a valued customer, and exercise due care to fulfill our obligations on time. We diligently protect the confidential information of the individuals, organizations, and business partners with whom we do business. BBS shares its labor, performance, ethics, environmental, health, and safety policies, practices, and expectations with its suppliers through its website.

5. Our Responsibilities Toward Our Competitors

We compete effectively but fairly, avoiding any form of unfair competition. We support efforts aimed at ensuring a competitive market structure.

6. Our Responsibilities Toward Society and Humanity

Protecting democracy, human rights, and the environment; promoting education and charitable work; and eradicating crime and corruption are of paramount importance to us. With the awareness of being a good citizen, we act responsibly and as a pioneer in social matters; we strive to participate in appropriate activities in non-governmental organizations, public service organizations, and other public service initiatives. We do not give or accept bribes or gifts or products or services exceeding the intended purpose.

7. Our Responsibilities Under the Name of BBS

Our clients and other stakeholders trust us thanks to our professional competence and integrity. We strive to maintain this reputation at the highest level. We provide our services within the framework of company

policies, professional standards, commitments, and ethical principles, and we demonstrate the necessary dedication to fulfill our obligations. We strive to provide services in areas where we believe we are and will be professionally competent, and we aim to work with clients, business partners, and employees who meet the criteria of integrity and legitimacy. We do not work with those who undermine public morality or harm the environment or public health. In public, and in areas where listeners believe we are speaking on behalf of our company, we express only the views of our company, not our own. When we encounter complex situations that could put BBS at risk, we first consult with the appropriate personnel, following appropriate technical and administrative consultation procedures.

At BBS, labor and performance reports are prepared annually, reviewed through internal audits, and shared with employees, customers, and suppliers through the website.

At BBS, external financial audits are conducted and reported by independent auditing firms four times a year, within the quarterly periods of each current year. These audits cover revenues and expenses, profits and losses, and investments during these periods.

II. POLICIES SUPPORTING THE CODE OF BUSINESS ETHICS

A. Conflict of Interest Policy

It is essential for BBS employees to avoid situations that could create a conflict of interest. It is a fundamental responsibility of all employees not to use company resources, name, identity, or power for personal gain, and to avoid situations that could negatively impact the organization's name and image. The following principles of practice identify conflicts of interest that employees may encounter in the performance of their duties or in their private lives due to their business relationships, and the principles to be applied in these situations.

1. Activities That May Cause a Conflict of Interest

Employees are required to fully comply with the principles outlined below and the activities that may create a conflict of interest. BBS takes the necessary steps to encourage its employees to comply with these principles.

a. Engaging in Activities That May Create a Conflict of Interest

Employees shall not engage in any business relationships that involve mutual or unilateral benefits with family members, friends, or any other third parties. Employees are prohibited from obtaining any commercial advantage, including trading company shares on the stock exchange, by leaking any confidential company information. They must not facilitate others in gaining such benefits. It is essential that employees do not engage, directly or indirectly, in activities that would classify them as a "merchant" or "tradesperson," nor work for any other individual and/or institution for remuneration or similar benefits, whether during or outside working hours, under any title or capacity. BBS reminds its employees of these matters. However, employees may work outside official working hours for another individual (family member, friend, or other third parties) and/or institution for remuneration or similar benefits.

- Does not create a conflict of interest with their duties and BBS practices within the company,
- Does not create incompatibility with other business ethics rules and policies supporting these rules,
- Does not negatively impact their ability to continue their duties within the company,
- Subject to written approval from management.

Employees are prohibited from serving as board members or auditors in companies outside of BBS without the approval of the company's Board of Directors; they may not hold positions in competitor companies or companies that have business relationships with BBS. However, employees may engage in social responsibility and charitable activities in non-profit organizations and universities, provided that these duties do not interfere with their responsibilities within the company and are performed with written approval from management.

Employees may engage in discussions and write professional articles on topics unrelated to the company and its operations, provided that such topics do not conflict with company policies. Use of the company's name in connection with these activities requires approval from the General Manager.

BBS employees may participate individually and voluntarily in any political party activities. Managers shall not require employees to engage in political work or become members of any political party. Employees may hold positions in political parties only under the following conditions and with written approval from management:

- Participation in any political activity must not create a conflict of interest with the employee's duties, practices, or conduct within the company.
- Employees are prohibited from engaging in any political activities during working hours and must not occupy their colleagues' time with such activities.
- During political activities, employees shall not use the company's name, their position, title, or any company resources.

Employees may personally provide financial or non-financial support and/or donations to third parties outside the company and may also serve in charitable organizations.

b. Abuse of Authority

It is unacceptable for employees to misuse their authority for their own benefit and/or that of their relatives, or in any way other than the due diligence expected of them, thereby causing harm to the company.

Employees shall not obtain direct or indirect personal gain from any purchasing, sales activities, transactions, or contracts entered into by the company.

Employees must not engage in acts or behaviors that violate ethics, laws, or company discipline.

c. Use of Resources

In the use of resources on behalf of the company, the company's interests shall be prioritized. Company assets, facilities, and personnel shall not be used outside the company under any name, for any person or purpose, without the company's interest.

Proper use of resources for the benefit of the company also requires effective use of time. During working hours, employees are expected to manage their time efficiently and not attend to personal matters. Managers are not permitted to assign employees to personal tasks.

It is essential that no personal visitors are accepted during working hours. Employees must conduct meetings with necessary visitors related to business matters in a reasonable time frame that does not disrupt workflow.

d. Relations with Other Individuals and/or Organizations in Commercial Relations with the Company

Employees shall not engage in private business relationships with the company's customers, suppliers, or other individuals and/or organizations with whom the company has commercial relations. Employees may not borrow money and/or goods/services for personal purposes from these parties, nor may they lend money and/or goods/services to them.

In dealings with customers, the following principles apply: even if in favor of the customer, no transaction may be conducted without the customer's knowledge; even if in favor of the company, exploitation of customer vulnerabilities is prohibited, and no profit shall be sought by providing incomplete or false information to customers.

Company personnel shall not request or imply any gifts from individuals or organizations with whom the company has commercial relations; they shall not accept any gifts, money, checks, property, free vacations, special discounts, or similar items that would place the company under obligation. Personal assistance or donations from any individual or organization with business relations with the company are not permitted. The Gift Acceptance and Giving Policy applies in this regard.

Providing statements to any media outlet, giving interviews, or participating as a speaker at seminars, conferences, or similar events is subject to the approval of senior management. No personal gain may be derived from these activities. BBS regularly reminds its employees of these matters.

B. Gift Acceptance and Giving Policy

It is fundamental that BBS employees do not accept gifts or benefits that could influence their impartiality, decisions, or behavior, nor engage in providing gifts or benefits to third parties and organizations that could create such influences.

The following principles govern the exchange of gifts between company employees and third parties or organizations with whom they have business relationships and set forth the policies to be applied in this regard.

Implementation Principles

1. Company employees are prohibited from accepting any benefits or gifts, whether of economic value or not, that affect or may potentially affect their impartiality, performance, or decision-making while performing their duties.
2. Employees may accept and/or give gifts or agree to special arrangements under the conditions that the gifts comply with the company's business objectives, applicable laws and regulations, and would not embarrass the company if disclosed to the public, as outlined in Article 3 below.
3. Provided the conditions in Article 2 are met, employees may give and receive entertainment, hospitality, and meals within generally accepted business standards. At seminars and similar events attended as company representatives, symbolic gifts such as awards, plaques, or souvenirs (excluding cash) may be accepted.
4. Offering, giving, or receiving bribes and/or commissions is strictly prohibited under any circumstances.
5. Employees are forbidden from accepting money, whether gratuitously or as loans, or having travel expenses, event costs, or similar payments covered by suppliers, consultants, competitors, or customers.
6. Gifts and promotional items to be given by the company to customers and other third parties with whom it has business relations are approved by senior management. Once approved, no further permission is required for distribution.
7. In accordance with the conditions specified in Article 2, the company may accept suitable products and services as gifts and, with the knowledge and approval of senior management, may provide gifts in the form of products or services appropriate to the recipient's culture and ethical values.
8. In exceptional cases where local cultural values require reciprocal gift-giving beyond the company's policy, such gifts may only be accepted on behalf of the company with senior management's approval. In all cases, gift exchanges must be conducted in accordance with local cultural norms.

C. Confidential Information Protection Policy

Information is one of the most important assets that BBS will utilize in achieving its vision. Accordingly, the effective use of information, its proper sharing, and ensuring the confidentiality, integrity, and availability of information throughout this process are joint responsibilities of both the company and its employees. It is essential that the information management systems established within our company and the processes implemented for confidentiality operate in harmony to maximize the benefits for the entire organization. The following implementation principles define what constitutes confidential information for the company and set forth the rules that employees must follow regarding confidential information.

Implementation Principles

Confidential information includes, but is not limited to, all types of innovations belonging to the company, as well as databases and processes written, discovered, developed, created, or implemented by employees; plans (marketing, technical); business strategies; information related to customers and suppliers; financial data; personnel information; customer lists; specifications; the identities of potential and actual customers; and any other such information.

Principles to be Observed Regarding Confidential Information

Unless disclosure is required by official authorities or legislation, confidential information shall not be disclosed to third parties.

Confidential information shall not be altered, copied, or destroyed. Necessary precautions shall be taken to ensure the careful handling, storage, and non-disclosure of such information. Any changes to the information shall be recorded with a history log.

Confidential files shall not be taken outside the company. Approval must be obtained from the person responsible or senior management for confidential information that needs to be taken outside the company.

Passwords, user codes, and similar identifiers used to access company information shall be kept confidential and not disclosed to anyone other than authorized users.

Confidential information shall not be discussed in public places such as dining halls, cafeterias, elevators, company shuttles, or similar locations.

Confidential information shall be classified according to its level of confidentiality, which shall be clearly indicated in the content. Employees shall be aware of the confidentiality levels of the information they obtain through their duties and shall act accordingly. In cases of doubt regarding the confidentiality level, the opinion of the relevant manager shall be sought.

When information is shared with third parties and/or organizations for the benefit of the company, a confidentiality agreement shall first be signed, or a written confidentiality commitment shall be obtained from the other party to ensure their responsibility for the security and protection of the shared information.

False statements and/or rumors about individuals or institutions shall not be made.

Personnel-related salary and other personal information reflecting company policy are confidential and shall not be disclosed to anyone other than authorized personnel. Such information should be sent to employees personally. Employees are strictly prohibited from disclosing this information to others or pressuring other employees to disclose such information.

D. Policy on Establishing and Maintaining a Fair Working Environment

BBS (Bilgi Birikim Sistemleri) considers the establishment and maintenance of a fair working environment for its employees as one of its highest priorities. The company aims to create a fair, respectful, healthy, and safe workplace in compliance with all relevant laws and regulations, thereby enhancing employee success, development, and engagement.

The following implementation principles set forth the fundamental rules for establishing and maintaining a fair working environment within the company.

Implementation Principles

Company practices comply with all applicable laws and regulations related to employment and labor. Employees also fulfill all legal requirements and act in accordance with legal regulations within the scope of their duties.

BBS human resources policies and practices ensure fairness in recruitment, promotion, compensation, rewards, social benefits, and all other related applications.

Discrimination based on language, race, color, gender, political opinion, belief, religion, sect, age, physical disability, or similar grounds among employees within the organization is strictly prohibited.

The company fosters a cooperative, positive, and harmonious working environment by preventing conflicts and ensuring that individuals with different beliefs, thoughts, and opinions work together in harmony.

Employees' privacy and personal space are respected.

BBS shares its policies related to these matters with its employees.

Communication between individuals shall not be violated by unauthorized persons. Even if lawfully recorded, unlawful disclosure, dissemination, or acquisition of personal data by others is prohibited. Personnel personal information that arises from and is necessary for the nature of the employment relationship shall not be used for purposes other than intended, nor shared with third parties without consent. The privacy of all employees, including their private and family lives, is respected. Alongside all forms of inviolability, employees' physical, sexual, and emotional integrity is safeguarded. Any violation of an employee's physical, sexual, and/or emotional integrity through harassment in the workplace or at any work-related location is against the law and ethical rules, and the company does not tolerate such offenses in any way. The purpose of this policy is to ensure that employees work in an environment where their physical, sexual, and emotional integrity is protected. Sexual harassment is defined as the violation of a person's bodily integrity through sexual acts and/or sexual harassment without physical contact. Accordingly, any behavior falling under this definition is prohibited. Furthermore, no tolerance is shown toward those who retaliate or behave negatively toward individuals who file complaints, report harassment, or assist during investigations.

No employee may request preferential treatment or receive special privileges based on gender, religion, language, or race, nor may anyone grant such privileges. Exploiting differences such as gender, religion, language, or race to obtain or grant concessions is unacceptable. The physical working environment and conditions should be maintained in a healthy and safe manner for all employees.

III. EMPLOYEES' RIGHTS

Employees may engage in discussions and write professional articles outside the company and its operations, provided they do not use the company's name. Employees may personally provide financial or non-financial assistance and/or donations to third parties outside the company and may serve in charitable organizations. Managers shall not assign employees to personal tasks.

Employees choose to work at Bilgi Birikim Sistemleri entirely of their own free will.

Employees have the right to freely join and withdraw from trade unions without prior permission in order to protect and improve their economic and social rights and benefits within the scope of their employment relationship. No one may be forced to join or leave a trade union.

This matter is reviewed once a year during Management Review meetings, monitored in ethical internal audits, and corrective/preventive actions are taken for the following period if any adverse conditions are encountered.

IV. EMPLOYEES' RESPONSIBILITIES

BBS's ethics-related policies and procedures clearly define the ethical standards regarding how we should act and conduct our work. Compliance with these rules is a fundamental responsibility of all employees.

Accordingly, all BBS employees are responsible for:

- Acting in compliance with laws and regulations under all circumstances,
- Reading and understanding BBS company policies, and being aware of the rules, principles, and values contained therein,
- Acting in accordance with these rules and principles,
- Consulting their manager regarding potential violations involving themselves or others,
- Promptly reporting any actual or suspected violations by themselves or others,
- Communicating such reports to their manager in writing or verbally, with or without disclosing their identity,
- Following the "ethical decision-making guidelines" defined to help ensure adherence to the rules and resolution of issues,
- Cooperating fully in ethical investigations, and
- Maintaining confidentiality regarding any information related to the investigation.

A. Steps and Methods to Follow When Making Ethical Decisions

When deciding on a course of action, the following steps should guide you. Ask yourself these questions to help ensure your decision aligns with ethical standards:

1- Identify the Issue or Problem

Are you being asked to do something that you believe may be wrong? Are you aware of a situation in the company that may be potentially illegal or unethical? Are you facing a decision where you are unsure how to act in accordance with business ethics?

2- Think Before You Decide

Clearly define and summarize the problem or concern. Ask yourself why this is an ethical dilemma. Consider the available options and their potential consequences. Think about who might be affected. Seek advice from others.

3- Decide on a Course of Action

Identify your responsibilities. Review all relevant facts and information. Refer to applicable company policies, procedures, and professional standards. Evaluate the risks and consider how they can be mitigated. Aim to create the best possible action plan. Consult with others as needed.

4- Test Your Decision

Reflect on key ethical questions. Review your decision within the framework of the company's core values. Ensure that you have considered company policies, laws, and professional standards. Consult others and consider their input in your intended course of action.

5- Proceed with Confidence

Share your decision and rationale with the relevant parties. Share what you've learned. Share your success story with others.

B. Four Key Questions to Consider

When faced with a decision or behavior, ask yourself the following:

- Is this action in compliance with laws, regulations, and established norms?
- Is it fair and balanced? Would I feel uncomfortable if someone else did the same?
- Would our company or stakeholders be concerned if all details of this activity were made public?
- Would I feel embarrassed or uncomfortable if others knew I was involved in this behavior?
- Could this action result in negative consequences for me or for the company?
- Who else might be affected by this (e.g., other employees within the company, yourself, etc.)?
- To what extent does the "perceived reality" align with the "objective reality"?
- What would a reasonable person think under the same circumstances?

V. RESPONSIBILITIES OF MANAGERS

BBS managers have additional responsibilities beyond those defined for all employees within the framework of BBS company policy. Accordingly, managers are responsible for:

- Creating and maintaining a corporate culture and working environment that supports ethical conduct,
- Setting an example through their own behavior to ensure the implementation of ethical principles,
- Educating their employees about the ethical rules,
- Encouraging employees to raise ethical questions, complaints, or concerns and support them in doing so,
- Providing guidance when consulted on what actions to take, and giving due consideration to all reports or concerns shared with them,
- Structuring their business processes in a way that minimizes ethical risks and implements the necessary methods and approaches to ensure compliance with ethical principles.

VI. OTHER RESPONSIBILITIES

The primary objective of the company's senior management regarding ethical matters is to reduce the number of internal issues and risks to zero through training, audits, and continuous improvement efforts.

Senior management is responsible for ensuring the effective implementation of the BBS company policy and fostering a culture that supports it.

The Human Resources Department is responsible for:

- Conducting an annual ethics risk assessment and fulfilling its requirements,
- Informing employees about the Code of Ethics and providing periodic training to ensure understanding of relevant policies and rules, as well as maintaining ongoing communication with employees on these matters,
- Ensuring that new hires read and are informed about the company policy.

Company Management is responsible for:

- Guaranteeing the confidentiality of complaints and reports submitted within the framework of the Code of Ethics and protecting individuals who make such reports,
- Ensuring the job security of employees who report ethical concerns,
- Guaranteeing that complaints and reports are investigated in a timely, fair, consistent, and sensitive manner, and taking the necessary corrective actions decisively in the event of any violations.

VII. RESOLUTION OF NON-COMPLIANCE WITH THE CODE OF ETHICS

Individuals who violate company policies and procedures will be subject to various disciplinary actions, which may include, if necessary, termination of employment. Disciplinary measures will also apply to those who approve of, direct, or fail to appropriately report misconduct or actions that lead to violations of the rules, despite having knowledge of them.

VIII. AUDIT OF ETHICS AND EMPLOYEE RIGHTS

BBS will be subject to an internal audit each year, conducted by the Ethics Committee established within the company to monitor the effectiveness of company policies and ensure their continuous improvement. The results of this audit will be documented and reviewed by company management. This process also serves as a form of internal self-assessment.

The audit will cover the following topics:

- Whether employees' fundamental freedoms are being restricted,
- Employment practices and legal compliance for apprentices, interns, and students,
- Legal compliance of working hours, overtime practices, and compensation,
- Effectiveness and communication of policies related to discrimination and harassment,
- Whether employees are provided with training on ethical issues such as gift and bribery policies and unfair advantage in business relationships,
- Verification of whether external financial audits are conducted,
- Communication of employees' legal rights to them,
- Presence of verbal, physical, visual harassment, psychological pressure, discrimination, and whether fair treatment is ensured,
- Effectiveness of policies against human trafficking and modern slavery,
- Enforcement of the policy that prohibits indebting employees to the company,
- Verification of whether labor and performance reports are shared with employees, customers, and suppliers,
- Monitoring whether employees are allowed to use their legally entitled leaves,
- Monitoring employees' ability to reach out to their managers regarding ethical behavior, complaints, and suggestions—and whether these matters are resolved,
- Monitoring whether company policies are reviewed by managers,
- Ensuring that employees are not prevented from joining trade unions,
- Ensuring that child labor is not used,
- Monitoring whether employees can freely voice complaints,
- Monitoring whether company policies are periodically reviewed by managers.

Bekir Alp Sayın
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