

## ETHICAL PRINCIPLES

### **Objective and Scope**

Natural Energy carries out its activities within the framework of the Natural Energy Ethical Principles prepared by the Board of Directors.

Ethical Principles are an indispensable set of rules that are created to regulate internal relations, relations of the company and all employees with customers, suppliers and other stakeholders, to increase the quality of service, and to increase the effectiveness in the protection of assets and resources, and are based on "truth" and "honesty".

The ultimate purpose of the Natural Energy Ethics Principles is to write down our code of conduct to create a common corporate culture on business ethics as an institution responsible to the society and to increase the awareness of our employees and stakeholders. In this direction, it is aimed to guide the employees of Naturel Energy and those who act on behalf of the institution to act in accordance with the laws and business ethics in the decisions and behaviors they will make while performing their duties.

The Ethical Principles described in this document are in integrity with company policies, values and principles and cover all Naturel Energy employees, Board members, suppliers and business partners, intermediaries, contractors, proxy workers and all third parties with whom work is done. We expect all these real and legal persons to comply with the Ethical Principles.

### **Relations with Employees**

As Naturel Enerji, we respect human rights and the reputation of all employees. We treat our employees within the framework of the principles of equality and honesty. In order to create a safe and healthy working environment; we comply with all applicable laws and regulations and aim to create good practice examples.

### **Protecting Human Dignity**

We consider our employees as our most valuable asset, respect their rights and protect these rights. We provide a respectful, fair and human dignified working environment for our employees.

We adopt an honest, trusting and constructive communication approach, exhibit ethical behaviors within the framework of love and respect, and avoid dishonorable and humiliating acts. We care about the opinions of our employees and create working environments where they can express their ideas freely.

In Naturel Enerji, we do not tolerate physical, sexual and all kinds of psychological harassment and violence. We show sensitivity to the protection of the personal rights of our employees, we do not allow all kinds of psychological pressure and harassment to violate personality values and to wear them out with emotional harassments. When such a situation is encountered, we investigate the situation subject to the complaint with care and meticulousness and ensure that the process is concluded fairly and quickly.

### **Respect for Diversity and Equal Opportunities**

As Naturel Energy, we follow global developments in human resources management and continuously establish and improve the working environment in a way that will increase the commitment of our employees with a dynamism suitable for different needs of the sector and functions. We do not discriminate based on religion, language, race, ethnicity, gender and sexual orientation in all human resources processes from recruitment to wage management.

### **Not Employing Child Workers**

As Naturel Enerji, we always consider the importance and potential of the young population and we care about this situation in our working conditions. In this respect, we continue our activities in accordance with the minimum age provisions specified in the Constitution, the Labor Law and the relevant legislation, and we do not employ child labor in our companies.

### **Harmful Substances, Drug and Alcohol Use, Gambling and Betting**

It is forbidden for Naturel Energy employees to use and/or be under the influence of substances that are harmful to human health (except for drugs recommended by the doctor) such as illegal drugs, alcohol, drugs, etc. while using the company's tools and equipment in the company's work areas. We do not work with individuals who cannot end such harmful habits (alcoholism, etc. at the level of addiction to harmful substances) outside of business life despite the warnings,.

In company and business-related events, we expect our employees to remember that they represent the company and not to act in a way that damages the company's reputation.

It is strictly forbidden to gamble, bet and play game of chance in the workplace and during working hours. We do not work with individuals who have such habits at the addiction level outside of the workplace and working hours.

### **Corporate and Personal Conflict of Interest**

Conflict of interest refers to the situation where employees have personal interests that affect or may lead to a perception that they are acting impartially and objectively. It covers all kinds of benefits provided to themselves, their relatives and relatives or the persons or organizations they are in contact with and other tangible or intangible obligations related to them.

A material conflict of interest involves a real or potential material gain. However, this material gain does not have to be in cash. Earnings such as gifts and treats are also included in this scope.

Although there is no material gain in intangible conflicts of interest, there is a personal interest. Trading in influence, use for reputation and liaison purposes can also be considered in this context.

Although the possibility that the employee's behaviors may be affected is a sufficient condition for the conflict of interest, another criterion in determining the conflict of interest is that a third party who looks from the outside thinks that the objectivity of the employee may be affected in the face of the situation in question.

We act in accordance with the law and relevant regulations in the event of detection and proving of contradictions that will affect the main activities and financial statements of Naturel Energy, cause violation of the relevant laws, damage the corporate image and/or benefit the employee due to his/her position and duty in Naturel Energy.

As Naturel Energy employees, we act with the awareness that it is essential that we do not request any discount or benefit, offer it to third parties, or accept it when offered from Naturel Energy or the real or legal persons with whom we have a corporate business relationship, which may be perceived as inappropriate. Apart from this, we do not enter into any personal debt-receivable relationship with third parties (suppliers and business partners, dealers and authorized dealers and authorized services, etc.) that are directly or indirectly related to our duties.

By acting fairly and honestly as Naturel Energy employees, we know that we need to take the necessary steps to avoid a conflict of interest and are obliged to report it to our superiors as soon as we become aware of a potential conflict of interest. In order to protect the reputation of Naturel Enerji, we carry out our duties in accordance with the principles of accountability and transparency; and in cases of uncertainty, we act with the awareness that we should consult our managers and/or the Naturel Enerji Ethics Committee.

## **Receiving and Giving Gifts, Representing and Hospitality**

As Naturel Energy employees; while conducting our relations during and after the determination of the supplier, business partner, customer, consumer, dealer, authorized dealer and authorized service; we act in a way that is transparent, do not accept gifts that will adversely affect our objective decision-making competencies, and do not allow the formation of impressions that there is an interest relationship.

At the end of the year and on special days, the gifts given to the stakeholders with the principles determined by the Naturel Energy administrations and the materials in the form of souvenirs and promotions are not included in this scope; we take the criteria such as "being moderate" and "not affecting the reputation of the company negatively in our stakeholders or third parties" as a basis when buying gifts, giving gifts or representing and hosting. We never offer cash, gift vouchers or any gifts equivalent to cash or we do not accept any of them.

### **Business Ethics – Abuse, Bribery and Corruption**

We conduct a zero tolerance policy against all forms of abuse, primarily bribery and corruption, advantage by using relationships with public officials, and violation of competition laws.

Corruption and taking advantage of relationships with public officials, or violation of competition law, expose the company as well as its suspects to severe disciplinary sanctions in terms of both compensation and criminal liability in accordance with applicable laws and regulations.

### **Insider Trading / Misuse of Information**

As Naturel Energy employees, we comply with legal regulations on the trading of stocks and do not use internal information (all kinds of commercial, financial, technical and legal etc.) that has not yet been disclosed to the public in order to benefit ourselves or third parties (insider trading /misuse of information). We do not provide unfair benefits or eliminate a loss in a way that disrupts the equality of opportunity among traders in the capital market.

Insider trading /misuse of information is illegal and includes various criminal sanctions, including imprisonment and severe fines. As Naturel Energy employees, we take care to take the necessary measures to protect confidentiality and to comply with our confidentiality obligation in the event that we leave the job.

We announce all our official statements to the shareholders, investors and the public through the persons and/or units authorized by Naturel Energy in accordance with the principle of equality in a complete, accurate, simultaneous and understandable way.

## **Purchase and Sale Policy of Shares**

Persons who may engage in insider trading / misuse of information in the Capital Market Law;

- a) Directors of publicly traded companies or their subsidiaries or controlling partnerships,
- b) Persons who have this information due to the fact that they have a share in public companies or their subsidiaries or controlling partnerships,
- c) Persons who have this information due to the performance of their work, profession and duties,
- d) Persons who obtain this information by committing a crime,
- e) It is defined as persons who know or need to know if the information they have is in the nature specified in this paragraph.

Accordingly, the employees of Naturel Energy and these persons who have access to corporate information cannot buy and sell the shares of Naturel Energy.

Regardless of whether or not it is included in this article, we show the necessary care and fully comply with all regulations in the Capital Market Law and the relevant legislation within the scope of information abuse.

## **Occupational Health and Safety**

In order to make the social and economic value we create sustainable, we provide all our employees, contractors and suppliers with a work environment in accordance with local legislation, especially the provisions of the Occupational Health and Safety Law No. 6331 published by the Ministry of Labor and Social Security consisting of healthy, safe and decent conditions. In this direction, we raise awareness of our human resources and raise awareness on these issues in order to ensure the continuity of a safe and healthy business environment. For this, we carry out practical and interactive training on occupational health and safety.